

PLYMOUTH WATER COMPANY RESPONSES TO
FIRST SET OF INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
D.T.E. 06-53

RESPONDENT: Ellen Kitchell
RESPONSE DATE: September 7, 2006

DTE 1-26 Please provide all correspondence between Plymouth and the DEP regarding the Company's most recent comprehensive compliance evaluation.

RESPONSE: Copies attached.



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHEAST REGIONAL OFFICE

20 RIVERSIDE DRIVE, LAKEVILLE, MA 02347 508-946-2700

MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

ELLEN ROY HERZFELDER
Secretary

ROBERT W. GOLLEDGE, Jr.
Commissioner

October 6, 2004

Ms. Ellen Kitchell
Plymouth Water Company
133 Raymond Road
Plymouth, MA 02360

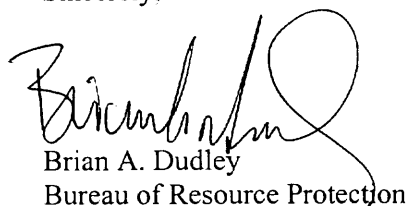
RE: PLYMOUTH – BRP/OWM
9P4-4-24-239.05
WMA
5Yr Review Approval

Dear Ms. Kitchell:

Attached please find the results of the 5 Year Review of your Water Management Act (MGL 21G) Permit in the Buzzards Bay Watershed.

If you have any questions about the Department's review of your WMA permit, the decision to authorize your withdrawals based upon the operating conditions of that permit, or the Water Management Act in general, please contact Jim McLaughlin at (508) 946-2805. Please note that the signature on this cover letter indicates formal issuance of the attached document.

Sincerely,




Brian A. Dudley
Bureau of Resource Protection

cc: Duane Levangie, DEP, Boston
Marisa Picone-Devine, Sarian Water Co.

Y:\DWP Archive\SERO\Plymouth-9P442423905-WMA-2004-10-06

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057. TDD Service - 1-800-298-2207.

DEP on the World Wide Web: <http://www.mass.gov/dep>

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WATER MANAGEMENT ACT (MGL 21G)
DEPARTMENT OF ENVIRONMENTAL PROTECTION
5-YEAR PERMIT REVIEW
PLYMOUTH WATER COMPANY, PERMIT NUMBER 9P4-4-24-239.05

The Department of Environmental Protection (the Department) has completed the 5 Year Review of your Water Management Act Permit in the Buzzards Bay Watershed. This review was conducted as a compliance review to insure that the terms of the permit and the goals of the Water Management Act (WMA) are being met.

The relative environmental stress has not been evaluated for the area where the Company's wells are located, that is, the wells are located in an unassessed area. The Department is currently limiting its scope of reviews in unassessed areas.

Our review included a file and database review, review of Geographic Information System (GIS) overlays, an inspection of your two well sites, and an interview with Marisa Picone-Devine and Donald Rugg of the Sarian Water Company, your current system operator. Although Plymouth Water Company (the Company) is complying with many special provisions of the permit, the Department has serious concerns regarding the water use by the Company's customers, and its potential impacts on the environment, neighboring registered water users, and the long-term health of the local aquifer.

The Company reported an annual average water usage of 134 gallons per capita per day (gpcd) for 2003. Additionally, the water use in the summer is over four times the wintertime use. The Department's goals for water use in unassessed basins include a maximum water usage of 80 gpcd and a summer to winter ratio of 1.2. The Company also exceeded its permitted annual limit by almost fifteen (15) million gallons in 2003.

The Ponds of Plymouth has not yet reached build-out. The existing permit was meant to provide the entire development with more than an adequate supply of water to allow lawns to be established. (The permit limit appears to be based on 100 gpcd, while the standard demand projections used 80 gpcd at the time the original permit was written in 2000.) The Company appears to be making best efforts in water conservation education, and the unaccounted for water is very low.

The Department encourages the Company to continue its public education campaign. Education materials should be tailored to apply directly to the Ponds by stressing that the health of the ponds depends on responsible water use and limiting fertilizers (Department inspection noted significant vegetation growth within a number of the ponds.) Residents must be made aware that irrigation water does not return to the aquifer, but is mostly lost to evaporation and transpiration. Water use information materials should be provided to all new customers, whether they buy a new or an existing home.

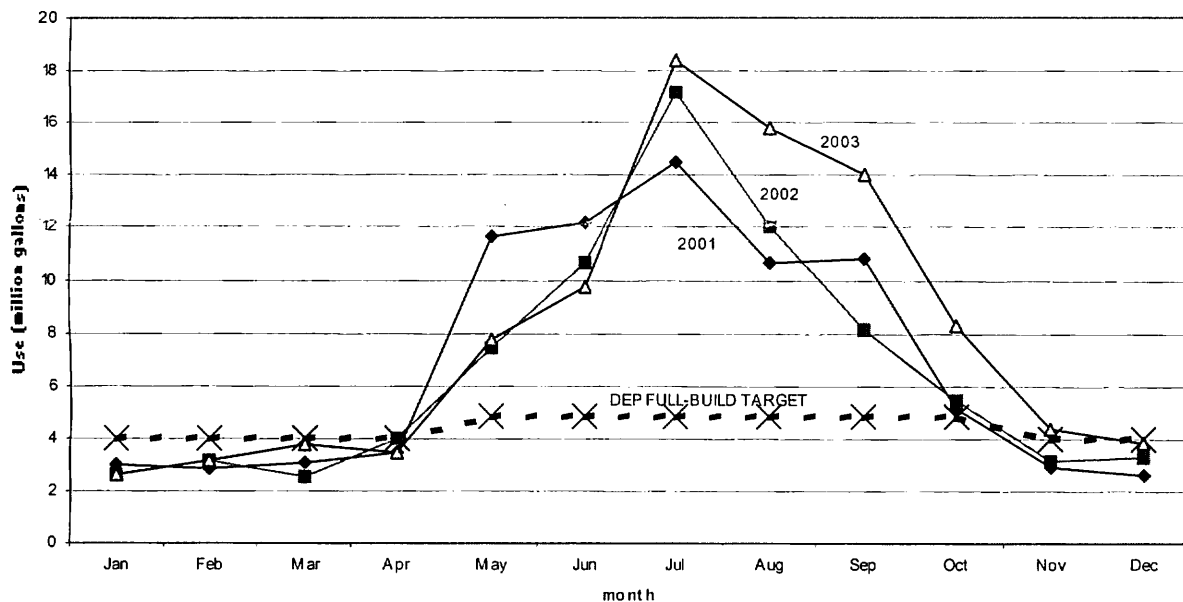
Our review *indicates* that the Plymouth Water Company is technically in compliance with each of the conditions imposed by permit #9P4-4-24-239.05 (see Table 1). Since the operating conditions of your original permit are still valid, the Department will not be modifying the permit at this time. You are required to continue operating your public water supply system consistent with the requirements of the permit as amended on March 8, 2002.

Table 1: Permit Requirement Evaluation

PERMIT REQUIREMENT	EVALUATION
100% metering	Yes
test meters over 10 years old	meters are replaced instead of repaired
annual master meter calibration	Yes
Leak detection every two years.	Not necessary due to very low UAW. Fixed as required.
Leak repair reports available for inspection.	Yes, two done on faulty services.
Fully-funded pricing system.	Goal – currently working on a rate increase.
Public education program.	Yes
Bill stuffers annually.	Yes-quarterly
Well #1 Max Day = 0.5 MG	This criterion was exceeded on 5/19/04 due to a lightning strike stopping well 2. DEP was promptly notified of the situation. (0.68 MG)
Well #2 Max Day = 1.0 MG	Not exceeded (0.675 max)
Average Annual System = 80.4 MG	95.15 MG – Over but currently allowable*

* The Plymouth Water Company must apply for a new permit PRIOR to exceeding its permitted limit by the threshold volume. New permits must comply with the Department's water use policies, including 80 gpcd in unassessed basins and 1.2 summer/winter ratio.

Plymouth Water Co. Monthly Use



PLYMOUTH WATER COMPANY

September 9, 2004

Mr. David A. DeLorenzo
Deputy Regional Director
Bureau of Resource Protection
Department of Environmental Protection
Commonwealth of Massachusetts
One Winter Street
Boston, Massachusetts 02108

Re: Plymouth Water Company
Permit 9P4-4-24-239.05
Action: 5-Year Review

Dear Mr. DeLorenzo:

I am in receipt of your letter dated August 19 in which you outline the review process and communicate your expectations with respect to the provision of additional information needed to complete the review.

Please accept the following responses to your questions/comments listed on Page 3 of your letter:

Item 1

The company entered into discussions with Steve Alcott of Alcott Associates in early winter of 2004 to provide the necessary guidance to undertake a rate review request. A copy of his proposal (which we have accepted) dated July 8, 2004 is attached. The collection of information necessary to undertake this process has all ready begun.

We have completed the "Water Conservation Plan for Public Water Suppliers" found on your website and have included that filing with this communication.

Item 2

In this item you identify the need to seek approval for the company's Demand Management Plan. The Demand Management Plan, as provided to the DEP included 5 "conservation" measures. Of the five measures only one required approval from the DTE. Specifically, I inserted a new section into our Rules, Rates and Regulations identified as ***Conservation Measures and Authorities*** which would permit the company to actively enforce conservation measures. During a telephone conversation with Paul Osborne of the DTE of today's date, I was informed that the changes were approved and that a letter will be sent to our office to that effect. A copy of the "revised" Rules, Rates

and Regulations is enclosed for your review. I have also included copies of correspondence from our file which accompanied various filings submitted to the Department of Telecommunications and Energy.

The plan also called for consumer communications. In this area we publish three communications a year (separate from billing stuffers) in which we address issues facing the company and the safety, security and conservation of the regions water supply. I am enclosing copies of our articles for your review.

Another element of our plan was to aggressively enforce collection of accounts receivable. In this area, we have succeeded admirably. For all intents and purposes we have \$0.00 Accounts Receivable within 60 days of our quarterly billings.

Another area in which we responded was to actively encourage conservation by establishing water bans (albeit voluntary) when deemed necessary. Initially bans were established when the Town of Plymouth implemented water bans. This was prudent and expedient because consumers are often unaware that the Town of Plymouth and the Plymouth Water Company are two separate and distinct entities. During this past summer (2004) we implemented voluntary water bans and to some extent they were successful although the Town had not implemented water bans.

The last component of the Demand Management Plan was to undertake a System wide survey. The surveys were mailed to the consumers along with an explanation of the survey's purpose but few responses were received. The Plymouth Water Company is a small water utility and currently does not have the financial resources to conduct a door to door survey.

Item 3

The projected service population based upon original estimates was to have been 800 households. Over time individual residences have been added and some residences are on individual wells. Based upon the building permits issued by the Town of Plymouth, the Ponds of Plymouth Development should grow by 45 households per year and we expect build-out of the development to conclude in 2005. Given 697 metered customers at December 2003, I anticipate 742 customers by year end 2004, and 787 by year end 2005. What is important to note is that our "rate base" for all intents and purposes will be fixed and ultimately our source of operating revenues will be limited by this fixed base.

From time to time the system has received inquiries from area developers with property contiguous to the Ponds of Plymouth, but none of those inquiries have produced concrete plans and hence no need for expansion.

Item 4

The company has implemented water bans as you indicated in your letter. The most effective have been those bans which “piggy back” the Town of Plymouth’s water bans. Again, consumers are more willing to participate when “everyone” is affected. Also, consumers do not make the distinction between the water supplied privately by the Plymouth Water Company and water supplied publicly by the Town of Plymouth. The water bans which we implement independently of the town are based upon our need to reduce water consumption as a whole. These bans have been effective in promoting conservation and education – because frequently we are contacted and this provides us with the opportunity to “air” DEP’s mandates and educate the consumer.

Water restrictions implemented by the Plymouth Water Company do not cover privately owned wells. The company is regulated to the extent of the water which it provides to the local residents. Private wells, including permitting, are the purview of the Town of Plymouth and outside of the company’s jurisdiction. It is a known fact that wells are installed in the Town of Plymouth without permits.

Other Considerations

The history of this water utility and the residential development it serves is tumultuous to say the least. This water utility exists because the Town of Plymouth was unable to provide water service. The water rate was challenged and changes were made to the rate structure in order to accommodate the original water system developer and the developments’ homeowners. The result was ill will in the community at large.

Our operational reality has been that, although we have operated the company for about 5 years, we are still fighting the stereotypical angers brought about by the original rate setting procedure. Rate increase discussions were not seriously undertaken until the winter of 2004 because the company recognized the need to establish some stability within the system before undertaking a task which promises to be difficult.

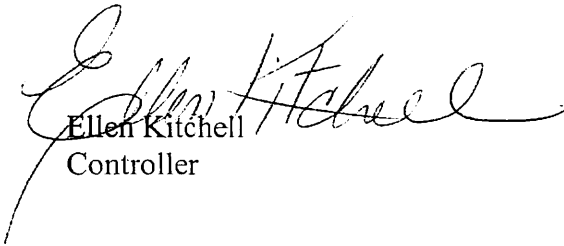
This historical background explains the reduced participation we encounter when attempting to meet DEP guidelines and regulations. I would expect that consumers can be brought around gradually, but aggressive procedures will alienate consumers and indeed encourage significant private well development. It is our belief that water withdrawal from the Buzzard Bay basin would increase significantly if consumers were on private wells. During the initial stages of this development water consumption was excessive. Following the original rate setting procedure consumption decreased dramatically.

You asked if private wells would be an issue. I can say that the Pond’s of Plymouth development, although not a wealthy area, is ripe for privately owned wells. Consumers moved to this area for large lots, green lawns and single family homes – the American Dream. Do these same consumers have the financial ability to install wells? I would have to argue yes, because with the exception of a few consumers, most appear to have financial resources. Are there private wells all ready in the development? Absolutely.

In summary, private wells have the potential to create serious cross contamination issues. In addition, private wells will be withdrawing water from the same aquifer and there will be no reasonable way to monitor consumption.

In conclusion, the Plymouth Water Company has implemented DEP and DTE mandates to the best of its ability and has acted responsibly in all areas of its operations.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ellen Kitchell", is written over the printed name and title. The signature is fluid and extends to the right.

Ellen Kitchell
Controller

Plymouth Water Company

Action: Order to Complete for 5-Year Review

**WATER MANAGEMENT PERMIT
5 YEAR REVIEW REQUEST**

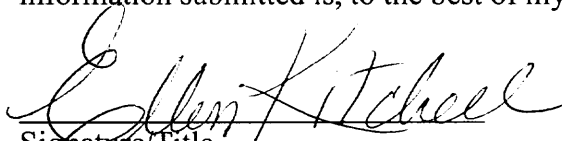
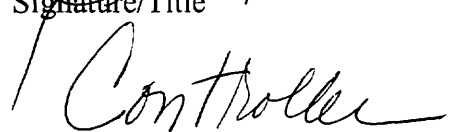
Regulations governing the Water Management Program 310 CMR 36.33(4) require that all permit holders file a request for review every five years. The Department requires your signature authorizing the 5 Year Review. Please sign the document below, attach it to the additional information requested in the Department's letter, and return it to the Department by **September 13, 2004**. Upon receipt of the information the Department will begin a final review of permit # **9P4-4-24-239.05**.

Please return all information to:

DEP Southeast Region
20 Riverside Drive
Lakeville, MA 02347
Attn: Jim McLaughlin

Certification Statement

I certify, under penalty of law, that this review request and all attachments were prepared under my supervision, in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete.


Signature/Title _____ Date 9/18/04


ALCOTT ASSOCIATES

UTILITY RATES & VALUATION CONSULTING

44 Laurel Street, Somerville, MA 02143

Phone & Fax: (617) 625 - 8653

FAX (413) 618-1187 ✓

email: sbalcott@aol.com

July 8, 2004

Ms. Ellen Kitchell
J H Lynch & Sons Inc.
50 Lynch Place
Cumberland, RI 02864

Subject: Proposal for Plymouth Water Company Rate Case

Dear Ms. Kitchell

Thank-you for asking me to submit this proposal for professional services in connection with an application to the Massachusetts Department of Telecommunications & Energy to increase the water rates of the Plymouth Water Company, including review and analysis of the current water rates and revenues of the Company, preparation of a filing to increase water rates, including testimony and supporting exhibits, assistance in responding to discovery, settlement and hearings, as required for the Company's rate application and such other work as requested by the Company.

A detailed description of the rate case process as well as a preliminary list of data needed for the study is attached hereto. The process comprises two phases: first, preparation of the filing and second, post-filing discovery, negotiation and possibly adjudication. The amount of post-filing costs cannot be accurately predicted but will depend on how many questions are asked and how involved the negotiations become. If adjudication is required then the costs would increase significantly.

Based on our January meeting I anticipate that most of the required data will be provided in a very "ready-to-use" form. This should reduce the effort required to assemble the filing package. Nevertheless, unforeseen questions or problems are always possible. Therefore I

July 8, 2004

have included what I believe is a reasonable "estimate", but am proposing a higher upset limit, which would not be exceeded without your authorization.

Estimated Cost to File	\$6,500
Proposed Upset Limit for Filing	\$9,000
Estimated Post-Filing Cost (range)	\$3,500 to \$10,000

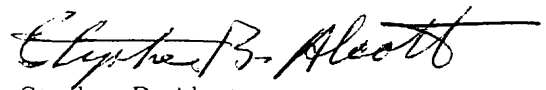
Therefore I propose to perform the work on a time-charge plus out-of-pocket expense basis, billed monthly, with fees for preparing the filing subject to an upset limit of \$9,000, which would not be exceeded without your authorization. A copy of our current rates and charges is attached.

Post-filing fees would also be on a time-charge plus out-of-pocket expense basis, billed monthly, at the then current rates, and would include participation in the public hearing and any settlement or adjudicatory hearings. A tabulation of the estimated hours supporting the above fees is attached for your reference.

For planning purposes, please note that the cost of the rate case needs to be deferred and amortized over at least 3 years, in order to recover that cost in actual revenues. Assuming the \$10,000 cost estimated above, plus \$5,000 for other direct expenses incurred by the Company for the rate case makes a total cost of \$15,000.

It was a pleasure meeting with you in January and I would be happy to discuss any questions you may have about this proposal or the proposed work.

Very truly yours,
ALCOTT ASSOCIATES


Stephen B. Alcott

Enclosures

Schedule of Fees & Charges
Rate Case Process – Massachusetts
Preliminary List of Data Needed

PLYMOUTH WATER COMPANY

DEMAND MANAGEMENT PLAN

Submitted To: Laurence S. Dayian, Chief
South Coastal Watershed
Department of Environmental Protection

Submitted By: Plymouth Water Company
Ponds of Plymouth Development and Adjacent Properties
Plymouth, Massachusetts

The Plymouth Water Company acknowledges the need for demand management of its water resources. Prior to filing its Water Management Permit request it had implemented voluntary customer communications designed to address the overall goal of water conservation.

The Company now outlines a five-pronged procedure to foster an environment of conservation and to address issues of acceptable water usage. The measures are as follows:

1. Establish water bans when environmentally prudent.
2. Educate the consumer through written communications.
3. Implement and enforce aggressive billing and collection procedures.
4. Request approval of revisions made to the Plymouth Water Company “Rates, Rules and Regulations Governing the Rendering of Water Service” from the Massachusetts Department of Telecommunications and Energy.
5. Undertake the development and implementation of a system wide consumer survey.

Establish Water Bans When Environmentally Prudent

The company addresses the implementation of water bans in the *amended* Section 22 of the Plymouth Water Company revised “Rates, Rules and Regulations Governing the Rendering of Water Service”. A complete draft copy of the document is attached.

The company undertook a “voluntary” Emergency Water Ban during the summer of 2001. Voluntary resident participation was received. A copy of the notice of the water ban has been included in the addendum.

Educate the Consumer through Written Communication

The Company has undertaken various consumer mailings, both regulated and non regulated which stress the need for a safe and clean water supply and the necessity for preserving and protecting that water supply.

Annually, since 1998, the Company’s current management have produced and distributed its Consumer Confidence Reports (CCR). The Consumer Confidence Reports address water quality and quantity issues as mandated by the Department of Environmental Protection (DEP) and these same reports have also been utilized as a tool to focus on conservation efforts. Copies of CCR’s are included in the addendum.

Non mandated consumer mailings have been used over the past three (3) years to stress the need for conservation and “good citizen” behavior with respect to water. Some of these mailings have used consumer “tips” to peak the consumer’s interest while others have been straightforward and direct. Copies of these communication pieces can also be found in the addendum.

Plymouth Water Company will continue to publish non mandated consumer communications three times per year beginning with one Spring mailing, followed by an early Summer mailing and concluding with a Fall mailing.

Implement Aggressive Billing and Collection Procedures

The Company, under new management in the late “90’s”, was burdened by excessive uncollected receivables and the resulting loss of operational cash flow.

In an ongoing effort the Management, working closely with the Massachusetts Department of Telecommunications and Energy (DTE) staff, has aggressively implemented existing billing and collection procedures outlined in Massachusetts General Laws and the existing Plymouth Water Company “Rates, Rules and Regulations Governing the Rendering of Water Service” as approved by the DTE many years earlier.

The aggressive collection policy serves to communicate to the consumer the “cost” of water, their dependence on water and in certain cases their obvious over-consumption of water. Timely collections provide the financial resources, which are required by this non-publicly owned utility, to operate soundly and prudently. By reviewing the schedule below you will note the effectiveness of the approach:

Analysis of “Stale” Accounts Receivable

	2001	2000	1999	1998
Year End A/R Balances	\$44,289.37	\$65,890.84	\$72,022.50	\$83,706.37
Less: Dec.Qtly Billings	\$35,192.74	\$29,481.86	\$26,478.29	\$15,462.47
“Stale” A/R	\$9,098.63	\$36,471.98	\$45,544.21	\$68,243.90
Decline in “Stale” A/R over Prior Yr	75% Decline	20% Decline	33% Decline	Not Available

The management of this non publicly owned water utility intends to continue to implement collection strategies which are currently available and has every intention of

implementing conservation efforts as noted in the *amended* Section 22 of the Plymouth Water Company revised “Rates, Rules and Regulations Governing the Rendering of Water Service”. A complete draft copy of the document is attached.

Request Approval of Revision from DTE

The Company is in the process of submitting to the DTE and requesting approval of “Rates, Rules and Regulations Governing the Rendering of Water Service”. This revision was written to specifically address Conservation Authorities, Enforcement Procedures and Prescribed Remedies available for the protection of both the consumer and the company. A complete draft copy of the document is attached.

Undertake Development and Implementation of a System-Wide Consumer Survey

The purpose of this survey will be to specifically identify the number of persons in each and every household, the types of heating systems utilized, the presence of swimming pools and irrigation systems, and the presence of an alternative water source – such as ground water or a well. This information will be instrumental in managing water demand, forecasting water demand, overseeing water conservation efforts and insuring water system quality. A copy of the survey is included in the addendum. It is expected that this survey will be mailed in early Spring. Completion of the survey is voluntary. The company intends to augment returns with physical observations as needed.

This Demand Management Plan was prepared by the management of Plymouth Water Company as the request of the Department of Environmental Protection, South Coastal Watershed.

Paul Anderson
Plant Superintendent

Ellen Kitchell
Operations Manager

March 1, 2002

PLYMOUTH WATER COMPANY
PLYMOUTH, MASSACHUSETTS

Draft

PLYMOUTH WATER COMPANY
PLYMOUTH, MASSACHUSETTS
M.D.P.U. NO. 4
ORIGINAL SHEET NO. 1

SCHEDULE OF WATER RATES

METERED SERVICE

AVAILABILITY

This rate schedule is available to all customers for all purposes except fire protection, subject to the Rules and Regulations of the Company.

SERVICE CHARGE

A quarterly service charge of \$25.00 per meter will be made to each customer. The service charge shall be due and payable in advance.

COMMODITY RATE

A charge of \$1.40 per 100 cubic feet will be made for all water used. Bills for water used shall be due payable in arrears as rendered.

PLYMOUTH WATER COMPANY
PLYMOUTH, MASSACHUSETTS
M.D.P.U. NO. 4
ORIGINAL SHEET NO. 2

SYSTEMS DEVELOPMENT CHARGES FOR NEW SERVICES

A Systems Development Charge will be charged by the Company at the time application is made for a new service, in the amount of \$2,000 per connection.

PLYMOUTH WATER COMPANY
PLYMOUTH, MASSACHUSETTS
M.D.P.U. NO. 4
ORIGINAL SHEET NO. 3

1. RULES AND REGULATIONS GOVERN RENDERING OF SERVICE:

The rules and regulations in their entirety as herein set forth, or as they may hereafter be altered or amended in a regular and legal manner, shall govern the rendering of water service, and every Customer, upon the ~~signing of an application for~~ acceptance of water service, will be bound thereby.

2. DEFINITIONS APPLICABLE TO FOLLOWING SECTIONS:

The word "Company" refers to the Plymouth Water Company, Inc.

The word "Department" refers to the Massachusetts Department of ~~Public Utilities~~ Telecommunications and Energy.

The word "Customer" shall be taken to mean any person, firm, corporation, government, or governmental division who receives water service supplied by the Company.

The words "main" or "main pipe" shall mean the supply pipe from which service connections are made to supply water to customers.

The words "service pipe" or "service connection" shall mean the service pipe from the main to the premises to be serviced, including corporation cock, curb cock, and curb box.

The words "public water system" refer to the water system owned and operated by the Company.

The word "premises" as used herein shall be restricted to the following:

- (a) A building under one roof owned or leased by one customer and occupied as one residence or one place of business.
- (b) A combination of buildings owned by one customer in one common enclosure, or occupied by one family, or one corporation or firm, as a residence ~~of~~ or place of business.
- (c) Each unit of a multiple house or building separated by a solid vertical partition wall, occupied by one family or one firm, as a residence or place of business.
- (d) Building owned by one customer having a number of apartments, offices, or lofts which are rented to tenants, using ~~in~~ common ~~on~~ halls and one or more means of entrance.

3. APPLICATIONS FOR WATER SERVICE

- (a) Application for a new street service connection or application for water service through an existing street service connection shall be made ~~in writing~~ by the owner of the premises to be supplied, or the owner's duly authorized representative.
- (b) No agreement will be entered into by the Company with an applicant until all arrears and charges due by the applicant at any premises now or heretofore owned or occupied by ~~him the applicant~~ the applicant shall have been paid. A payment plan on overdue charges can be arranged if so desired.
- (c) Property owners-tenants may also make application for water service through an existing street service connection and may pay the charges for water service. The property owner will be required to contract for water service furnished to premises where the tenants are changing more than twice a year.
- (d) Any change in the identity of the contracting Customer at any premises will require notice ~~a new application~~ and the Company may, after reasonable notice, discontinue the water service until such ~~reasonable~~ notice has been made and accepted.
- (e) The Company shall furnish, install, own and maintain all service connections. (Provided the costs of material and labor supplied by the Company for excavation, backfill, and removal, and replacement of paving, walks, curbs, etc., including the hiring of traffic control personnel, and obtaining the street opening permits, necessarily incurred in respect to new services or replacement of old services, shall be borne by the customer or other applicant for service.)
- (f) The Company shall provide, furnish, install, own and maintain meter and meter installations.

4. SPECIAL APPLICATIONS FOR WATER SERVICE:

- (a) Water for transit, temporary or special purposes must be specially applied for.
- (b) Whenever a street service connection is made to the mains for temporary service, or for building or construction purposes, the applicant will bear the cost and expense of installing and maintaining such service, and shall bear the entire cost and expense of eliminating such service (if required) when temporary usage has terminated. The applicant will be liable for the amount of water used in accordance with the schedule of rates of the Company.

5. CUSTOMER'S LIABILITY FOR CHARGES:

- (a) A Customer who receives water service to any premises shall be held liable for all water service furnished to such premises until such time as the Customer properly notifies the Company to discontinue the service for such account and a final meter reading is obtained.

6. SERVICE CONNECTIONS:

- (a) The Company will make all connections to its mains and will specify the size, kind and quality of all materials for service connection.
- (b) As used herein, service connection means the service pipe from the main to the premises to be serviced, including the corporation cock, curb cock, and curb box, and will be furnished and installed by the Company and shall remain the property of the Company and under its sole control and jurisdiction.
- (c) Water service will not be turned on until such time as a meter is set in accordance with the Company's Rules and Regulations under "Meters and Meter Installations."
- (d) The curb box shall be kept accessible at all times.
- (e) The Company shall in no event be responsible for maintenance of or for damage done by water escaping from the service pipe or any other pipe and fixtures on the outlet side of the curb cock.
- (f) The Customer's service pipe and all connections and fixtures attached thereto shall be subject to the inspection and approval of the Company before the water will be turned on.
- (g) Each premise shall be supplied through an independent service pipe from a separate curb cock and box, and all double houses, apartment houses, office buildings or business blocks shall have a separate service connection and curb box for each tenant unless otherwise specifically approved or ordered by the Company in which event the owner is to be solely responsible for all water used on and in said buildings or premises.
- (h) When more than one building, apartment or premises is supplied through a single service pipe, any violation of the rules and regulations of the Company with references to either or any of the said buildings or premise shall be deemed a violation as to all, and ~~the~~ water service shall be discontinued after the property has been posted for at least 30 days and reasonable opportunity allowed for each building or premises to attach their service pipes to separately controlled service connections which will be installed by the Company at the expense of the Customer.

PLYMOUTH WATER COMPANY
PLYMOUTH, MASSACHUSETTS
M.D.P.U. NO. 4
ORIGINAL SHEET NO. 6

- (i) Any repairs, maintenance or replacement necessary to the Customer's pipes or fixtures in or upon the Customer's premise shall be performed by the Customer at the Customer's sole expense and risk.

7. PLUMBING MUST BE APPROVED BY COMPANY:

- (a) All plumbing work in connection with the Company's water mains or appurtenances shall be submitted for the inspection by the Company, and no under-ground work shall be covered up until inspected and approved by the Company. Whenever the Company determines that a job of plumbing is obviously defective, although not in direct violation of these rules and regulations, the Company will insist upon its being corrected before the water service will be turned on supplied.

8. CROSS-CONNECTIONS NOT ALLOWED:

- (a) No pipe or fixtures connected with the mains of the Company shall be connected with pipes or fixtures supplied with water from any other source unless specifically approved by the Department of Public Health of the Commonwealth of Massachusetts and the Company.
- (b) Piping systems supplying swimming pools and/or tanks ~~in which~~ might become polluted, shall be so ~~arranged~~ designed so as to preclude water from re-entering the water distribution system ~~by siphonage or other means~~. These installations are subject shall in each case to annual ~~be approved~~ by the Company.
- (c) Fire pumps and booster pumps of any nature may be connected only after notification to the Company and shall be constructed in such a manner as to prevent cross connections and vacuum. Owners and operators of such equipments are liable for any and all damages to the Company and/or other customers property during such operation.
- ~~(d)~~ The plumbing on all premises supplied from the Company's water system shall conform to the Commonwealth of Massachusetts plumbing codes, the Sanitary Code of the town (s) where political subdivision is located, and/or regulations specified by the Department of Public Health, or the Department of Environmental Protection.

9. METERS AND METER INSTALLATIONS:

- (a) The Company shall specify the kind and size of meter to be installed.
- (b) Meters will be furnished, installed and removed by the Company and shall remain its property.

- (c) The Customer shall provide at his/her own expense a readily accessible and protected location for the installation of a meter and reading device at such a point as will control the entire supply to the premises, which location must be acceptable to the Company as most convenient for its service, so that the meter and or reading device may be easily examined, read and/or removed and replaced; and the Customer shall also provide at his/her own expense suitable pipe connections and the necessary valves and other fittings as may be designated by the Company for the proper installation and protection of the meter.
- (d) When the Customer's meter is not installed in a heated building it shall be placed in a meter box, or vault, furnished at the expense of the Customer, which box or vault shall be placed just inside the Customer's property line or at such other location as may be ordered by the Company.
- (e) Each Customer shall have a separate meter. Double houses, apartment houses, offices or business blocks may be served through a single meter where the arrangement of the interior piping does not permit individual meters but in such cases the owner of the property shall be responsible for the payment of the bills.
- (f) Meters will be maintained by the Company at its expense insofar as ordinary wear is concerned, but damage due to hot water, freezing or other external causes shall be paid for by the Customer.
- (g) The Customer shall promptly notify the company of any damage to the meter, meter ~~or its connections~~, or reading device. The Customer shall not permit anyone who is not an agent of the Company or otherwise lawfully authorized, to remove, inspect or tamper with the meter or other property of the Company.

10. MULTIPLE METERS:

- (a) When more than one meter is installed on a customer's service because of conditions in the Company's distribution system, the registration of such meters shall be combined.
- (b) When more than one meter is installed on a Customer's premises at the request of the Customer or due to conditions existing on the premises of the Customer, each meter shall be treated separately as if it belonged to a separate Customer and the registrations shall not be combined and a service charge shall be rendered for each meter.
- (c) Where existing premises are used by more than one family or occupant, and are supplied through one service and meter, they shall be construed to be double premises, triple premises, etc., depending upon the number of families, occupants, or subdivisions, and shall be subject to separate service charges for each such family, occupant or subdivision

11. METER TESTS AND TEST FEES:

- (a) All meters are accurately tested before installation and are also subjected to periodic tests. The Company may at any time remove any meter and or reading device for routine tests, repairs or replacement and may, at its option and expense, test any meter or reading device when the Company has reason to believe that it is registering inaccurately.
- (b) The Customer may request the Company to make a special test of the accuracy of a meter, which test will be made in accordance with the standard provisions of the Department of ~~Public Utilities~~ Telecommunications and Energy. ~~Such special test shall be witnessed by the Customer and/or the Customer's authorized representative~~ The Customer and/or the Customer's authorized representative shall witness such special test.
- (c) For such special test, the fee as established herein shall be paid in advance by the complainant but should the said meter be found upon said test to be more than two percent incorrect to the prejudice of the Customer, the fee so paid shall be returned to the complainant. This correction shall apply to both over and under registration and another ~~meter which has been properly calibrated~~ meter, which has been properly calibrated, shall be installed.
- (d) ~~For the fee associated with the testing test of meters made upon request of by the Customer the following fees shall be paid~~ charged as follows:

2 inch meter or smaller	\$ 35.00
Over 2 inches	\$100.00

12. PUBLIC FIRE HYDRANTS:

- (a) All public fire hydrants shall be furnished, installed and maintained by the Company.
- (b) Any expense for repairs caused by the negligence of employees of the ~~municipality~~ the municipality or by members of the fire department will be paid for by the respective organization ~~municipality~~.
- (c) The use of fire hydrants will be restricted to the taking of water for the extinguishing of fires and water shall not be taken from any fire hydrant for construction purposes, sprinkling streets, flushing sewers or gutters or for any other use unless specially expressed in writing by the Company for the particular time and occasion.
- (d) ~~Inspections and tests of public hydrants will be made by the Company~~ The Company will make inspections and tests of public hydrants at convenient times and reasonable intervals.

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- (e) Whenever a change in location, size or type, or permanent removal of a fire hydrant is requested by a municipality and/or a Customer ~~municipality and/or a Customer~~ request a change in location, size or type, or permanent removal of a fire hydrant, such change will be made by the Company at the expense of the municipality and/or the Customer.

13. PRIVATE FIRE SERVICE:

- (a) ~~The entire cost of the labor and materials for installing a private fire service or the replacement thereof from the main to the premises will be paid for by the Customer~~ Customer will pay for the entire cost of the labor and materials for installing a private fire service or the replacement thereof from the main to the premises. The Company shall furnish, install, own and maintain all new service connections, provided the costs of excavation, backfill, and removal, and replacement of paving, walks, curbs, etc., including the street opening permits, necessarily incurred in respect to new services, shall be borne by the Customer or ~~to~~ by the applicant for service. All work performed on the Customer's premises shall be done by the Customer at his own expense.
- (b) A gate valve controlling the entire supply will be placed on the fire service between the main and the property line of the premises being serviced. Any valve pit or vault ~~which may be required~~ vault, which may be required, will be furnished at the expense of the Customer.
- (c) The private fire service shall be subject to the inspection and approval of the Company before the service is made effective.
- (d) A private fire service connection is permitted only for the purpose of supplying water for the extinguishments of fires, and no use of water from such connections for any other purpose shall be made without approval of the Company.
- (e) The Customer shall notify the Company within a period of seventy-two (72) hours after any usage of the sprinkler system.
- (f) A detector check valve with by-pass, including meter installed in such by-pass, shall be furnished and installed by the Customer in accordance with Company requirements, just inside the building wall or other convenient location on the Customer's premises as designated by the Company. Any meter pit or vault required by the Company shall be constructed and maintained at the expense of the Customer. The by-pass meter will be maintained by and at the expense of the Company.
- (g) Any repairs or maintenance performed within the property of the Customer, ~~whether~~ whether done by the Customer or the Company, will be at the Customer's sole expense, and that performed in the street will be at the expense of the Company.

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- (h) Hydrants and other fixtures connected with a private fire service connection may be sealed by the Company and such seals shall be broken only in the case of fire or as specially permitted by the Company, and the Customer must immediately notify the Company of the breaking of such seal.
- (i) No pipe or fixture connected with a private fire service connection served by the Company shall be connected with pipes or fixtures supplied with water from any other source.
- (j) The Company shall approve the size and location of any connection made to its mains for private fire service.
- (k) The entire private fire service connection and all parts of it which are located outside of the premises of the Customer are and forever remain the property of and come under the complete jurisdiction of the Company.
- (l) No test of Fire Services shall be permitted without the express approval of the Company, (who may elect to have a representative present). They Tests -shall be scheduled to cause the least possible inconvenience to the Company's other Customers.

14. DISCONTINUANCE OF WATER SERVICE:

- (a) Service rendered under any application, contract or agreement may be discontinued by the Company, after reasonable notice, for any of the following reasons:
 - (1) For willful or indifference t waste of water due to any cause, such including as failure to repair service leaks within Customer's own premises.
 - (2) Misrepresentation in application and or notice as to identity of water service subscriber.
 - (3) For vacancy.
 - (4) For nonpayment of any account for water supplied by water service.
 - (5) Failure to recognize Water bans as outlined in Water Conservation Measures/Authorities (revised section 22).
- (b) Whenever the Customer desires to have the service contract terminated or the water service discontinued, the Customer shall so notify the Company. Until such notice is received by the Company and the Company has access to remove the meter or obtain the final readings, the Customer shall be responsible for the payment for all service rendered by the Company, including charges for meter repairs caused by damage from by hot water, or freezing or other external causes. A reasonable time after receipt of such notice shall be allowed the Company to take a final reading of the meter or meters and to discontinue service.

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- (c) Discontinuing the supply of water to any premise for any reason shall not prevent the Company from pursuing any lawful remedies by action at law or otherwise for the collection of monies due from the Customer.

15. RENEWAL OF WATER SERVICE AFTER DISCONTINUANCE:

- (a) When water service to any premises has been terminated for ~~any reason~~ other than temporary vacancy it will be renewed only after the acceptance of a new application and when the conditions, circumstances or practices which caused the water service to be discontinued are corrected to the satisfaction of the Company, ~~and upon~~ including the payment of all charges due and payable by the Customer in accordance with the rates, rules and regulations. A payment plan on overdue charges can be arranged if so desired.

16. TURN-ON CHARGE:

- (a) When it is necessary to discontinue water service to any premises because of violation of the rules and regulations or ~~an on~~ account of non-payment of any bill, or by request of a customer for any reason, a charge of ~~twenty-five~~ fifty dollars ~~dollars (\$50.00 25.00)~~ will be made to ~~partiallyly cover~~ offset the expense of turning on the water and this charge together with any arrears that may be due the Company for charges against the Customer must be paid before the water service will ~~again be turned on~~ restored.
- (b) If at the time of such discontinuance of service a non-residential Customer does not have a deposit with the Company, the Company may require a deposit in accordance with Massachusetts Department of ~~Public Utility~~ Telecommunications and Energy regulations as a guarantee of the payment of future bills before the water service will be ~~turned on~~ restored.

17. BILLS FOR WATER SERVICE:

- (a) Customers are responsible for furnishing the Company with their correct address. Failure to receive bills ~~will is not to be~~ considered an excuse for nonpayment nor ~~will it~~ permit an extension of the date the account is deemed ~~when the account would be considered delinquent~~.
- (b) All bills will be sent to the address provided ~~entered in the application or notice~~, unless, the Company is notified in writing ~~by the Customer of any change of in~~ address.
- (c) If requested in writing by the Customer, the company will send bills to and will receive payments from agents or tenants acting as agents. However, this accommodation will in no way relieve the Customer of the liability for all water charges and the Company shall not be obligated to notify the Customer of the nonpayment of water bills by such agents or tenants acting as agents.

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- (d) Payments shall be made at the office of the Company in person, by U.S. Mail or other acceptable delivery service or at such other places conveniently located as may be designated by the Company.
- (e) The Company will not be bound by bills rendered under mistake of fact as to the quantity of service rendered except if that mistake is due to Company negligence or omission.
- (f) The use of water by the same Customer ~~in~~ at different premises or localities will not be combined, and each water service installation shall stand by itself.

18. TERMS OF PAYMENT:

- (a) All bills shall be payable upon receipt. However, no residential bill shall be considered "past due" under applicable law or these regulations in less than forty-five (45) days from receipt. No disputed portion of a bill which relates to the proper application of approved rates and charges, or the Company's compliance with these regulations, shall be considered "due" during the pendency of any complaint, investigation, hearing or appeal under these regulations.
- (b) Special charges, such as temporary services, shall be payable on demand.
- (c) Bills for the service charges for metered service shall be due and payable in advance. Bills for water used shall be due and payable in arrears. The Company may render bills on either a semi-annual, quarterly, bi-monthly or monthly basis at the option of the Company.
- (d) Bills for service will be rendered periodically in accordance with these regulations. A bill shall be deemed rendered when it is delivered to the customer personally or three days following the date of the mailing of the bill to the mailing address supplied by the Customer to the Company. Except as otherwise provided herein, if payment for water service in full is not made within 45 days from the date the bill was rendered, the Company shall have the right to discontinue service to ~~these~~ premises of the Customer to which the bill applies, in accordance with applicable provisions of the General Laws of the Commonwealth and procedures provided-identified in applicable regulations of the Department of ~~Public Utilities~~ Telecommunications and Energy.
- (e) The Company may terminate service to a household in which all residents are sixty-five (65) years of age or older only after such Company first secures the written approval of the Department. In addition to the application for such approval filed with the Department, the Company shall concurrently give written notice to the Department of Elder Affairs (or ~~an~~ any such agency designated by the Department of Elder Affairs for such purposes), any third person to be notified pursuant to 220 CMR 25.05 (2), and the residents of such household. Prior to approval by the Department of such application, no Company may send notices threatening termination of service to any household which has notified the

Company that all residents of the household are sixty-five (65) years of age or older.

19. ABATEMENTS AND REFUNDS:

No abatement shall be made which arises from leaks or water wasted by improper or damaged service pipes or fixtures belonging to the Customer, or for water services left on due to vacancy.

20. PRESSURE AND CONTINUITY OF SUPPLY:

(a) The Company does not guarantee a sufficient or uniform pressure, or an uninterrupted supply of water and Customers are cautioned to provide sufficient storage of water where an absolutely uninterrupted supply must be assured, such as for steam boilers, domestic hot water systems, gas engines, medical equipment, etc.

(b) In high level sections where pressure is low, if the Customer desires a higher pressure than that furnished at the mains of the Company, the Customer shall install at his ~~own~~ her own expense a tank and/or booster pump, of a type and installation approved by the Company.

(c) Where the pressure to a Customer's premises is greater than desired, it shall be the Customer's responsibility to install the proper regulating device to reduce the pressure to the extent desired.

(1) The Company shall have the right to reserve sufficient supply of water at all times in its reservoirs to provide for fire or any other emergencies, and may restrict or regulate the quantity of water used by its Customers in case of scarcity, or whenever the public welfare may require it. Refer to Water Conservation Measures/Authorities (Section 22).

21. INTERRUPTIONS IN WATER SUPPLY:

(a) The Company may at any time shut off the water in the mains in case of accident, or for the purpose of making connections, alterations, repairs, changes, or for other reasons, and may restrict the use of water to reserve a sufficient supply for public fire service or other emergencies whenever required for the the public welfare. ~~may require it.~~

22. CONSERVATION MEASURES AND AUTHORITIES :

(a) The Company reserves the right to restrict water usage during drought conditions and periods of excessive consumption by consumers, if water supplies are deemed low. Restrictions are always deemed necessary to guarantee fire flow protection, health and sanitary requirements and whenever required for the public good.

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(b) The Company will, when possible, elect to implement water use restrictions consistent with those developed by the the Town of Plymouth, so that town residents, as a group are subject to the same restrictions. The Company reserves the right to utilize a more restrictive use policy if it determines that it faces a water supply shortage.

(c) The followings procedures will be utilized to announce, implement and enforce water use restrictions:

The company will provide advance notification to local agencies including the Department of Environmental Protection and the Department of Telecommunications and Energy prior to implementation of water use restrictions. The associated penalties and enforcement procedures will be on file with the respective agencies.

Customers shall receive advanced notification through local media outlets or company mailings that water restrictions will be implemented. In the case of an emergency requiring immediate implementation termination of service must be deferred until the customer is personally notified of the restrictions.

(d) Water use restrictions will follow the customary four (4) stage method and customers will utilize their numerical address in determining water use permissions. Consumers with even numbered addresses may use water resources on even dates and those with odd numbered addresses may use water resources on odd dates.

Stage 1: Voluntary water conservation. Outside water usage is limited to an odd-even allocation program between sunset and sunrise. Water may not be used to fill pools or wash vehicles.

Stage 2: Mandatory water conservation. Outside water usage is limited to odd-even allocation program between sunset and sunrise. Water may not be used to fill pools or wash vehicles.

First violation: Written Citation (No financial penalty)

Second violation: Termination of water service for a 24 hour period plus company costs of termination and restoration.

Stage 3: Mandatory water conservation. Utilization of lawn sprinklers, irrigation systems, soakers and unattended hoses are expressly forbidden. Outside water usage is restricted to use of hand held devices for one hour per day between the hours of 7:00 PM and 7:00 AM following the odd-even allocation program. Water may not be used to fill pools.
First violation: Written citation (No financial penalty)

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Second violation: Termination of water service for a 24 hour period plus company costs of termination and restoration.

- (e) Notwithstanding anything to the contrary all consumers who are found liable for the termination and/or restoration of water service must also defer the company's costs. The charge will be \$50.00 per service visit.

Stage 4: Complete (total) mandatory water conservation. All outside use of water is forbidden.

First violation: Written citation and a \$ 250 financial penalty

Second violation: Termination of water service for a 24 hours period plus company costs of termination and restoration, and \$250 financial penalty

- (f) For purposes of this section the company will charge a \$50.00 fee for each service termination and a separate \$50.00 fee for each service restoration. This rate structure supercedes Section 16(a) of this document.

- (g) For purposes of this section an odd/even water use permission plan should be interpreted to mean that residents with even numerical addresses may use water on even numbered days while residents with odd numerical addresses may use water on odd numbered days.

22-23. LIABILITY OF COMPANY:

- (a) The Company will undertake to use reasonable care and diligence in order to prevent and avoid interruptions and fluctuations in the service, but it cannot and does not guarantee that such will not occur.
- (b) The Company shall in no event be liable for any damage or inconvenience caused by reason of any break, leak, or defect in the Customer's service pipe or fixtures.

23-24. GENERAL:

- (a) The service pipes, meters and fixtures on the Customer's premises shall at all reasonable hours be accessible to the Company for observation or inspection.
- (b) No person shall turn the water on or off at any street valve, corporations cock, curb cock, or other street connection, or disconnect or remove any meter without the consent of the Company. Penalties provided by law for any such action will be rigidly enforced.

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- (c) Employees or agents of the Company are expressly forbidden to demand or accept any compensation for any service rendered to its Customers except as covered in these rates, rules and regulations.
- (d) No employee or agent of the Company shall have the right or authority to bind it by any promise, agreement or representation contrary to the letter of these rules and regulations.
- (e) Any complaint against the service or employees of the Company should be made at the office of the Company and preferable in writing.
- (f) The Company shall have the right to cut off the water supply to make repairs, changes or connections to its mains and other equipment. It will use reasonable effort to notify Customer in advance of such discontinuance of service, but it will not be liable for any damage or inconvenience suffered by the Customer because of such discontinuance of service, or because of failure to notify the Customer in advance of its intention to discontinue service.

24.25. APPROVAL OF THE RULES AND REGULATIONS:

- (a) All ~~rules~~ rules and regulations of the Company are subject to the approval of the Department of ~~Public Utilities~~ Telecommunications and Energy of the Commonwealth of Massachusetts and if any part thereof should be adjudged to be in violation of any rule or order made by the Department, then that particular part shall be ineffective but without in any way affecting the other portions thereof.

PLYMOUTH WATER COMPANY

July 25, 2001

EMERGENCY VOLUNTARY WATER BAN ON LAWN WATERING

The conservation of natural resources should be important to every consumer. Protection and conservation of the pure and natural water supply that is found here, in southeastern New England, is essential for our quality of life.

Our customers are encouraged to participate in voluntary conservation efforts to protect and extend the water supply throughout the calendar year. It is especially important during the dry months of July and August, to conserve our water supply. Simple measures such as replacing worn gaskets and reducing non-essential watering of greenery can produce a significant reduction in water consumption. Not only will these conservation measures guarantee a continued quality of life but they will also reduce your water costs.

The company requests that you comply with a ban on lawn watering from 8:00 AM until 5:00 PM Monday through Friday.

June 28, 2002

EMERGENCY WATER BAN

The water available to the resident's of the Ponds of Plymouth Development is dropping precipitously due to drought conditions. Because of these conditions residents have increased their dependence upon lawn irrigation systems.

Water use restrictions are now in effect to guarantee health and sanitary water requirements and fire flow protection. To insure success the company asks all customers to follow the following voluntary guidelines:

- ↓ Lawn watering is permitted between sunset and sunrise based upon an odd/even allocation program.
- ↓ Residents with even numbered addresses may use water on even numbered days and residents with odd numbered addresses may use water on odd numbered days.
- ↓ Water may not be used to fill pools or wash vehicles or any other non-essential purposes.

Residents are encouraged to participate in voluntary conservation efforts to protect and extend the water supply throughout the calendar year. Not only will these conservation measures guarantee a continued quality of life but they will also reduce water costs.

The company requests that you give your full cooperation to these conservation efforts.

Plymouth Water Company, 133 Raymond Road, Plymouth, MA (508) 759-6877

August 13, 2002

MANDATORY EMERGENCY WATER BAN

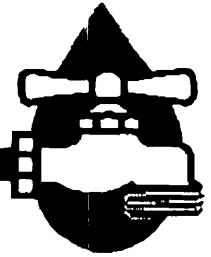
An Emergency Water Ban is now in effect for all property owners who are served by the Plymouth Water Company. An emergency water ban means that non-essential water use is not permitted at any time. Lawns and gardens cannot be watered. The use of water to wash vehicles or fill pools is also prohibited. Essential water use is considered for sanitary purposes within the residence. Any property owner found in violation of this ban will find water service to their residence discontinued. Appropriate charges will be assessed for the restoration of water service.

This Emergency Water Ban is authorized under the Plymouth Water Company Rates, Rules and Regulations approved by the M.D.P.U. August 15, 1991. Section 20(d) Pressures and Continuity of Supply reads in part: "The Company shall have the right to reserve sufficient supply of water at all times in its reservoirs to provided for fire or any other emergencies and may restrict or regulate the quantity of water used by its Customers in case of scarcity, or whenever the public welfare may require it."

Plymouth Water Company, 133 Raymond Road, Plymouth, MA (508) 759-6877

Plymouth Water Company

133 Raymond Road
Plymouth, Massachusetts 02360
(508) 759-6877



Important Notice

The Plymouth Water Company currently has a voluntary water ban in effect. This ban urges all customers to abide by the following.

Lawn watering is permitted between sun set and sun rise based upon an odd/even allocation program.

Residences with even numbered addresses may use water on even numbered days and residences with odd numbered addresses may use water on odd numbered days.

Water may not be used to fill pools or wash vehicles or any other non-essential purposes.

This residence is not participating in the voluntary conservation efforts. If all residences serviced by Plymouth Water Company do not cooperate with the current ban ^{The Company} we will be forced to implement a mandatory ban prohibiting all out door watering.

Plymouth Water Company

**133 Raymond Road
Plymouth, Massachusetts 02360
(508) 759-6877**

Important Notice 2003

The Plymouth Water Company currently has a voluntary water ban in effect. This ban urges all customers to abide by the following.

Lawn watering is permitted between sun set and sun rise based upon an odd/even allocation program.

Residences with even numbered addresses may use water on even numbered days and residences with odd numbered addresses may use water on odd numbered days.

Water may not be used to fill pools or wash vehicles or any other non-essential purposes.

This residence is not participating in the voluntary conservation efforts. If all residences serviced by Plymouth Water Company do not cooperate with the current ban, a mandatory ban prohibiting all out door watering will be implemented.

Plymouth Water Company

**133 Raymond Road
Plymouth, Massachusetts 02360
(508) 759-6877**

Important Notice

2004

The Plymouth Water Company currently has a voluntary water ban in effect. This ban urges all customers to abide by the following.

Lawn watering is permitted between sun set and sun rise based upon an odd/even allocation program.

Residences with even numbered addresses may use water on even numbered days and residences with odd numbered addresses may use water on odd numbered days.

Water may not be used to fill pools or wash vehicles or any other non-essential purposes.

This residence is not participating in the voluntary conservation efforts. If all residences serviced by Plymouth Water Company do not cooperate with the current ban, a mandatory ban prohibiting all out door watering will be implemented.

IMPORTANT NOTICE TO THE CUSTOMERS OF THE PLYMOUTH WATER COMPANY

JULY 12, 2004

Last week, The Department of Environmental Protection (DEP) conducted a Water Management Act Permit review of the Plymouth Water Company. The DEP has serious concerns regarding the increased water consumption by the customers of the Plymouth Water Company over the past several years. In fact, during their site visit they observed any number of customers watering lawns during the day. They have requested that the company implement immediate water conservation measures.

As of this date, a voluntary water ban will be in effect. We are requesting that all customers abide by the following:

Lawn watering is permitted between sunset and sunrise based on an odd / even allocation program.

Residences with even numbered addresses may use water on even numbered days, and residences with odd numbered addresses may use water on odd numbered days.

Water may not be used to fill pools, to wash vehicles, or for any other non-essential purposes.

We ask that all customers participate in this voluntary ban to conserve water. If water consumption is not curtailed to a level that is acceptable to DEP, a mandatory ban prohibiting all out door watering will be implemented.

We thank you for your cooperation!

~ Consumer Notes - Fall Edition ~

The Plymouth Water Company is pleased to produce the eighth edition of Consumer Notes. With this publication the company hopes to provide you with useful tips for conserving your water resources.

DON'T BE LEFT OUT IN THE COLD THIS WINTER!

Plymouth Water Company warns homeowners of one of winter's worst woes - frozen water pipes! Frozen water pipes are inconvenient but broken water pipes are expensive.



Here are some helpful, preventative suggestions:

- Turn off outside faucets. (Disconnect the hose. Turn off the water from inside your house and drain the pipe.)
- Patch any cracks and holes in doors, windows, and walls near pipes. (When the temperature drops to near zero, a high wind blowing through a small opening can freeze a nearby pipe, even though the temperature in the room is 70°F.)
- Insulate pipes and faucets in unheated areas. (Wrap pipes with pipe-insulating material, which is available at hardware stores. **DO NOT** leave the water running overnight. This will not prevent pipes from freezing. Instead, it will **increase your water bill.**)
- Never completely shut off the heat when you are gone. (If you are planning to leave your home for an extended period of time and you don't drain your

pipes, you want to lower the thermostat, but never shut it off. The lack of heat can freeze the pipes in the walls and basement. Freezing bursts the pipes and, when the house warms up, the thawing water will cause flooding and a significant amount of damage.)

BE PREPARED. Take precautions early. Make sure you have the name and telephone number of your plumber handy. Being prepared for the cold can keep you from being left out in the cold and without water.

Safe Drinking Water Begins at Home!

A variety of popular "fall-cleaning" and automotive products, from paint stripper to degreaser, contain potentially dangerous chemicals. How carefully you use and discard these products can protect - or pollute - our community's drinking water sources. **Help us keep your drinking water SAFE.**

The Plymouth Water Company is regulated by the Department of Environmental Protection (DEP) and the Department of Telecommunications and Energy (DTE). It is the responsibility of these organizations to safeguard and oversee the administration of the natural resources found within the Commonwealth of Massachusetts and to insure that consumers and producers are treated fairly when administering, selling and consuming natural resources within the state.

Plymouth Water Company
113 Raymond Road, Plymouth, Massachusetts 02360
Office Number 508-759-6877 • Emergency Number 508-312-2026
System managed by Sarian Company

~ Consumer Notes - Spring Edition ~

The Plymouth Water Company is pleased to produce the seventh edition of Consumer Notes. With this publication the company hopes to provide you with useful tips for conserving your water supply.

HELP US TO INSURE THAT A QUALITY WATER SUPPLY IS AVAILABLE TO YOU AND
PLEASE TO CONSERVE



When spring arrives everyone wants to get out of the house after the long cold winter. We look forward to planting our gardens, cleaning our yards, working on our lawns, and perhaps washing our cars. Here are a few *All Season* tips that can help you save money and conserve water before you hit the yard!

- Check for and fix leaks right away.
- Use a broom or rake, not a hose, to clean driveways.
- Don't shower too long or fill the tub too full.
- Turn the water off while you shave or brush your teeth.
- Keep a pitcher of water in the refrigerator so you don't have to run the water to cool it off before drinking.
- Run your dishwasher and washing machine when full.

Once Spring Arrives, Here are Some Helpful Tips

- Take a good look at your landscaping. Consider planting drought resistant grasses, shrubs and flowering plants.
- Place mulch around existing plants and shrubs. This will help retain moisture in the soil and eliminate the necessity to water.
- Water lawns and gardens in the early morning hours (2:00 A.M. – 5:30 A.M.). Water only when necessary. This will promote strong root systems and prevent mold and mildew from growing on the lawn.
- Never leave a garden hose running unattended.

The 2003 Consumer Confidence Report will be issued in the next few weeks. Please take a moment to read this important communication when you receive it.

The Plymouth Water Company is proud to acknowledge that tests of its water supply have never shown evidence of contamination since the system was developed in the mid 1990's. Keep in mind that contamination of a water supply can result from residential septic systems, use of pesticides, faulty home heating oil tanks, and hazardous household cleaners. Such contamination can find its way into your water supply by leeching into the ground or as a result of cross contamination. Cross contamination occurs when water which is not provided by our system pumps, ends up in our system because the homeowner or homeowners fail to install a cross connection device. This type of device will not allow water that is present in your home or lawn sprinkler system back into the water supply. Remember that the environment is your responsibility and the responsibility of your neighbors.

Plymouth Water Company

13 Maynard Road, Plymouth, Massachusetts 02360

Office Number 508-734-4871

Emergency Number 508-312-2016

System managed by Parker Company

Consumer Notes – Fall Edition

The Plymouth Water Company is pleased to produce the sixth edition of Consumer Notes. With this publication the company intends to highlight issues or topics of interest concerning frozen pipes and a company update.

Don't Be Left Out in the Cold This Winter

Plymouth Water Company warns homeowners of one of the winter's worst woes – frozen water pipes!

Here are some helpful, preventative suggestions:

- **Winterize sprinkler systems** – Contact your professional if you require assistance.
- **Turn off outside faucets** – Disconnect the hose. Turn off the water from inside your house and drain the pipe.
- **Patch any cracks and holes in doors, windows, and walls near pipes** – When the temperature drops to near zero, a high wind blowing through a small opening can freeze a nearby pipe, even though the temperature in the room is 70°F.
- **Insulate pipes and faucets in unheated areas** – Wrap pipes with pipe insulating material, which is available at hardware stores. Leaving the water running overnight **MAY NOT** prevent pipes from freezing but will increase your water bill.
- **Never completely shut off the heat when you are gone** – If you are planning to leave your home for an extended period of time and you don't drain your pipes, you want to lower the thermostat, but never shut it off. The lack of heat can freeze the pipes in the walls and basement. Freezing bursts the pipes and, when the house warms up, the thawing water will cause flooding and a significant amount of damage.



So **BE PREPARED**. Take precautions early. Make sure you have the name and telephone number of your plumber handy. Being prepared for the cold can keep you from being left out in the cold without water this winter.

Plymouth Water Company completed construction of a second well - Well #2 - in October of this year. This well, located at the northern end of the development, was designed to meet the needs of the expanding Ponds of Plymouth development. While the well will provide more than adequate water supply, the Department of Environmental Protection (DEP) will continue to limit water consumption in order to sustain conservation efforts. The source of the water supply for both Well #1 and Well #2 is the Plymouth Carver aquifer. This source is shared by many cities and towns in the southeastern region of Massachusetts. Ongoing conservation measures will protect this aquifer and will allow the Ponds of Plymouth residents to enjoy the benefits of a pure, safe, secure, and non-interruptible water supply.

Plymouth Water Company
113 Raymond Road
Plymouth, Massachusetts 02360
Office Number 508-759-6877
Emergency Number 508-312-2026
System managed by Sarian Company

Consumer Notes – Summer Edition

The Plymouth Water Company is pleased to produce the fifth edition of Consumer Notes. With this publication the company intends to highlight issues or topics of interest concerning excess water consumption and conservation measures.

Why is Lawn and Landscape Water Use an Issue in Massachusetts?

Water suppliers, particularly in fast growing parts of the state, are finding it increasingly difficult to meet summertime water demands. These demands can double or triple water use in a community and threaten both the sufficiency and safety of our water system.

Increased water demand can threaten the ability of water suppliers to store water for water pressure and fire protection purposes. Large peak demands that exceed the intended capacity of the water supply system can also impair water quality. As more water is pumped from water sources, pollution existing in outlying areas can be drawn into drinking water supplies. Higher pumping rates also have the potential to increase levels of iron and manganese and, in coastal communities, sodium in water supplies. These naturally occurring elements may affect the aesthetic quality of drinking water and may require treatment to remove.



PLEASE CONSERVE OUR WATER!

Tips for Saving Water in Your Home:

Save 4-10 Gallons a day by turning off tap while brushing teeth or shaving. Save 3-7 Gallons per flush by not using toilet as a wastebasket. Save 3-7 Gallons per minute by not taking long showers. Save 8-15 Gallons per day by filling sink while washing and rinsing dishes. Save 15 Gallons per load by running dishwasher only when full. Save 2-4 Gallons per day by washing veggies and fruit in a basin, using

vegetable brush to remove dirt. Save 2-7 Gallons per day by running garbage disposal only when necessary. Save 30-100 Gallons per week by running washing machine only when full or adjusting water level.

Tips for Saving Water in Your Yard:

Water your lawn only when necessary. It takes 625 gallons of water to supply 1,000 square feet of lawn with one inch of water. This is nearly the same amount of water you use inside the house in an entire week. Water your lawn when it begins to show signs of wilting – when the grass does not spring back when you step on it – rather than on a regular schedule. Use mulch around trees and shrubs and in garden beds. This greatly reduces the amount of water loss through evaporation which in turn limits the necessity to water.

Plymouth Water Company
113 Raymond Road, Plymouth, Massachusetts 02360
Office Number 508-759-6877
Emergency Number 508-312-2026
System managed by Sarian Company

Volume 2003
Number 4
May 15, 2003

Consumer Notes - Spring Edition

The Plymouth Water Company is pleased to produce the fourth edition of Consumer Notes. This edition is dedicated to preservation of water, and water quality within our community.

No matter where you live, your drinking water starts its journey to your home from a watershed, a land area that drains to a single body of surface water or to ground water. Everything that happens in your watershed can affect the quality of your water supply (EPA).

According to Groundwater Guardian, a non profit organization, clean groundwater is a vital resource that is all too often taken for granted. Groundwater is the source of 51% of America's drinking water; 99% of rural America's drinking water; 25% of industrial and mining water; and 37% of agricultural water (mostly irrigation).

Consumers must protect the natural resource – **Water** – through a combination of conservation measures and awareness of activities which directly affect the purity of the water supply. Consumers should consider:

- ✓ Using porous surfaces such as decking, gravel and brick to create outdoor living spaces. These materials allow for the absorption of rain directly into the soil in order to recharge underground water sources and provide irrigation for lawns and gardens.
- ✓ Planting hardy shrubs and lawns to reduce dependence on lawn irrigation. Lawn irrigation can be extremely wasteful and expensive.
- ✓ Reducing or eliminating the use of pesticides and recycling trash whenever possible. You will protect groundwater supplies from contamination.
- ✓ Properly disposing of all chemical products and recycling used oil. A single quart of motor oil can contaminate up to 2 million gallons of drinking water.

The Plymouth Water Company is regulated by the Department of Environmental Protection (DEP) and the Department of Telecommunications and Energy (DTE). It is the responsibility of these organizations to safeguard and oversee the administration of the natural resources found within the Commonwealth of Massachusetts and to insure that consumers and producers are treated fairly when administering, selling and consuming natural resources within the state.



Plymouth Water Company
133 Raymond Road
Plymouth, Massachusetts 02360
Office Number (508) 759 – 6877
System managed by Sarian Company

Emergency Number (508) 312 - 2026

Consumer Notes - Fall Edition

The Plymouth Water Company is pleased to produce the third edition of Consumer Notes. This edition is dedicated to the safety of the community and protection of the natural resource – water.

Violence is on the rise in the community! The most visible form of violence which affects the operation of a water system is vandalism. It is not uncommon to have had someone tamper with a water hydrant, remove or deface posted safety and environmental signage, or spray paint graffiti on plant buildings and structures. Water hydrants are provided for fire protection – no one should be using water from a fire hydrant unless they are representing the fire department in an official capacity, or they are a water company employee. Signs posted on water company property caution the reader concerning high voltage or changes in landscape, or notify the reader that the area is federal water shed area which must be protected – these signs are placed for your safety and the safety of your water supply. Residents of the Ponds of Plymouth community are encouraged to notify the police if individuals are observed on water company property, or near structures, safety and environmental signage, and fire hydrants. Your commitment to monitoring the area, in which you live, will help to preserve the quality of life you expect in your neighborhood! **Be Alert!**

Thank You! The mandatory conservation measures implemented in early August were very successful. Within days of implementation the system's water reserves were being replenished to pre-drought levels. The company will continue to administer the partial mandatory water ban put into effect on August 30, 2002 in order to combat ongoing drought conditions in the region. It is important to note that conservation measures are always implemented with the knowledge of the Department of Environmental Protection (DEP) and the Department of Telecommunications and Energy (DTE).



Plymouth Water Company
133 Raymond Road
Plymouth, Massachusetts 02360
Office Number (508) 759 – 6877
Emergency Number (508) 221 - 5578
Paul Anderson, Water Superintendent

Volume 2002
Number 2
August 28, 2002

Consumer Notes - Summer Edition

The Plymouth Water Company is pleased to produce the second edition of Consumer Notes. With this publication the company intends to highlight issues or topics of interest concerning the environment, focus on the area's natural resources, and communicate conservation measures.

A mandatory conservation policy was implemented in early August. The policy was implemented with the knowledge of the Department of Environmental Protection (DEP) and the Department of Telecommunications and Energy (DTE). It is the responsibility of these organizations to safeguard and oversee the administration of the natural resources found within the Commonwealth of Massachusetts and to insure that consumers and producers are treated fairly when administering, selling and consuming natural resources within the state.

The mandatory conservation measures were implemented because the consumption of water by the residents of the Ponds of Plymouth reached an alarming level. That conservation measure has safeguarded hundreds of thousands of gallons of water. The company is cognizant of the need to maintain lawns, gardens and shrubbery to preserve the beautiful neighborhood which is the Ponds of Plymouth. **To that end, company management has determined that a partial mandatory water ban will replace the complete water ban effective August 30, 2002.** Under the new ban you may water your lawns, gardens and shrubbery using the odd even allocation method outlined earlier in the year. (*Residents with even numbered addresses may use water on even numbered days and residents with odd numbered addresses may use water on odd numbered days.*) Residents may not use water to wash cars, fill pools or for other non-essential purposes. Any property owner found in violation of this ban will find water service to their residence discontinued. Appropriate charges will be assessed for the restoration of service.

The Plymouth Water Company remains committed to providing a safe and pure water supply. The company is continuing with the development of a second well to insure the community of a non-interruptible water supply.

Plymouth Water Company
133 Raymond Road, Plymouth, Massachusetts 02360
Office Number (508) 759 – 6877 Emergency Number (508) 221 - 5578
Paul Anderson, Water Superintendent

Consumer Notes - Spring Edition

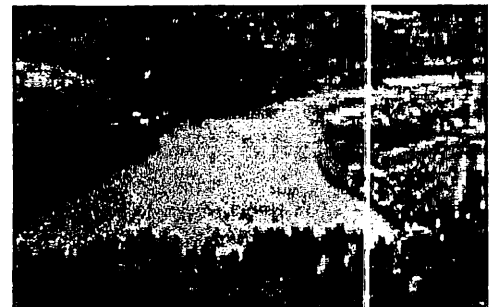
The Plymouth Water Company is pleased to produce this first edition of Consumer Notes. With this publication the company intends to highlight issues or topics of interest concerning our environment, focus on our area's natural resources, and communicate when appropriate - necessary conservation measures.

The U.S. Environmental Protection Agency hosts a web site, which features many articles on the environment. Since the Town of Plymouth is considered part of the south coastal watershed and enjoys tidal areas, ponds and cranberry bogs the EPA site www.epa.gov/watertrain/wetlands may be of interest. The site features the Watershed Academy, which provides an education module on Wetlands. Wetlands are defined as tidal areas, swamps, and ponds. Wetlands sustain water quality, provide habitats for plants, animals, birds and fish, and provide humans with recreational, educational and economic opportunities. After visiting this site you will have a greater respect for the natural resource – water, and have a more complete understanding for the need to conserve water.

The Plymouth Water Company is regulated by the Massachusetts Department of Environmental Management and must meet environmental mandates issued by this authority. These mandates require that the company encourage water conservation by consumers and reduce consumer dependence on water in order to protect the environment. During this period of “drought” you the consumer should be particularly aware of the need to voluntarily conserve. Conservation can begin with:

- ✓ Repairing leaking faucets, showerheads and toilets.
- ✓ Installing water controls on showers to reduce water use.
- ✓ Limiting lawn watering to late evening hours.

The company will implement mandatory conservation when necessary.



The Plymouth Water Company remains committed to providing a safe and pure water supply. Presently, the company is developing a second well to insure the community of a non-interruptible water supply. This well should be completed by the late fall of 2002.

Plymouth Water Company
133 Raymond Road, Plymouth, Massachusetts 02360
Office Number (508) 759 – 9877 Emergency Number (508) 221 - 5578
Paul Anderson, Water Superintendent



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
ONE WINTER STREET, BOSTON, MA 02108 617-292-5500

MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

ELLEN ROY HERZFELDER
Secretary

ROBERT W. GOLLEDGE, Jr.
Commissioner

August 19, 2004

Ellen Kitchell, Controller
Plymouth Water Company
P.O. Box 7201
Cumberland, RI 02864

RE: Plymouth - WMA
Plymouth Water Company
9P4-4-24-239.05
Action: 5-Year Review

Dear Ms. Kitchell:

The Department of Environmental Protection ("the Department") is beginning its 5 Year Review of the Plymouth Water Company Water Management permit issued under the Water Management Act (MGL 21G). We have conducted an initial compliance review of the permit. Based upon this review we have a number of questions that need to be addressed.

Regulations governing the 5 Year Review of the Water Management Program 310 CMR 36.33(4) require all permit holders to apply for review of their permit. The Department requires you to complete and return the enclosed Request for Review Form and a Water Conservation Plan for Public Water Suppliers, together with a response to our questions, by **September 13, 2004**, to: DEP, 20 Riverside Drive, Lakeville, MA 02347, attention Jim McLaughlin.

If you have any questions regarding this letter please contact **Jim McLaughlin** at (508)946-2805.

Sincerely,

David A. DeLorenzo
Deputy Regional Director
Bureau of Resource Protection

File Name: Y:\DWP Archive\SERO\PERMIT #9P4-4-24-239.05-WMA-2004-08-19

Cc: Duane LeVangie DEP/Boston
Plymouth Water Co., 133 Raymond Rd., Plymouth, MA 02360

This information is available in alternate format. Call April McCabe, ADA Coordinator at 1-617-556-1171. TDD Service - 1-800-298-2207.

DEP on the World Wide Web: <http://www.mass.gov/dep>

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Plymouth Water Company

Action: Order to Complete for 5-Year Review

The Department has begun the 5 Year Review of the Plymouth Water Company's Water Management permit. This order to complete is a description of the additional information required to complete the 5 Year Review of your permit. The Department may, at its option, agree to a request for an extension of the time allowed to submit all or part of the additional information required, if the request is received in writing by **September 3, 2004**. Please note that failure to respond within this timeframe could result in enforcement action by the Department.

The Department is conducting this 5 Year Review to assess what modifications may be necessary based upon recent water use and recently implemented policy and standards.

Following the completion of the review of your response to this order to complete the Department may be preparing a modified permit. The modified permit will be based in large part on the response to the order to complete. In addition, the modified permit will be consistent with the recently issued policy "Water Management Policy For Permit and Permit Amendment Applications and 5-Year Review, Effective Date: April 2, 2004 WMA Policy #: BRP/DWM/DW/P04-1, found on the Department's web site at <http://www.mass.gov/dep/brp/wtrm/wtrmregs.htm>.

This policy identifies the standards and conditions to be applied to new and exiting Water Management permits. A description of these standards as they will apply to the modified permit is described in the following Order to Complete.

Plymouth Water Company

Action: Order to Complete for 5-Year Review

ORDER TO COMPLETE
BUZZARDS BAY BASIN WATER WITHDRAWAL PERMIT 5-YEAR REVIEW
MASSACHUSETTS WATER MANAGEMENT ACT
M.G.L. c 21G

PERMIT NUMBER 9P4-4-24-239.05

The following information is necessary to complete the 5 Year Review of your Water Management Permit.

1. Special Condition 5, Water Conservation Requirements – Pricing: Your Water Management Permit requires you “to ensure that water supply system operations are fully funded by water supply revenues.” The Sanitary Survey dated July 13, 2004, requires you to seek a water rate increase within sixty days of that document. Please ensure a thorough response to that requirement so that it may be used to fulfill this 5-year review requirement. Please also complete and return the Water Conservation Plan For Public Water Suppliers found at <http://www.mass.gov/dem/programs/intbasin/download.htm>. Contact Jim McLaughlin at (508)946-2805 if you need a hard copy of this document.
2. Special Condition 5, Water Conservation Requirements – Demand Management: Please submit all written communications and describe any conversations between the Plymouth Water Company and the Department of Telecommunications and Energy to document your efforts to obtain approval of your draft Demand Management Plan.
3. Please provide a projected service population projection over the next five years, including the number of connections added per year.
4. The Department is aware that the Company has implemented water restrictions or water bans in the past, and two this season. What is the current practice of implementing water restrictions and water bans? What triggers the implementation of the restrictions and bans and do they apply to private wells? If the restrictions do not apply to private wells has the implementation of water restrictions or water bans led to an increase in the number of private wells? Please include a discussion regarding Company’s ability to achieve the goals set by the Department’s policy.
5. Please sign and return the enclosed “Water Management Act Permit 5 Year Review Request” form.

Modified Permit

The Department may be modifying the Company’s Water Management permit, subject to the recently issued policy, referenced above. The standards and conditions of the modified permit will be based upon the degree of stress that has been identified by the Water Resources

Plymouth Water Company

Action: Order to Complete for 5-Year Review

Commission for the basin where the Plymouth Water Company's sources are located. As identified in the December 13, 2001 report "Stressed Basins in Massachusetts" the Company's sources are located in the Buzzards Bay basin, which is identified as "unassessed." Since the basin is unassessed permit modification will require, at a minimum:

- a. Residential water use no greater than 80 gallons per capita per day (gpcd);
- b. Unaccounted for water no greater than 15%;
- c. Accurate reporting of raw water withdrawal volumes from all individual sources;
and
- d. Calibration of master meters at least once a year on an annual basis.

Although the Department's current policy does not institute a seasonal water use cap for unassessed basins, it is important to note that the Company reported an annual average water usage of 133 gpcd for 2003. Additionally, the water use in the summer is four times the winter use (*summer to winter ratio = 4.07 average for years 2001 through 2003*). The Department's goals for water use in unassessed basins include a maximum water usage of 80 gpcd and a summer to winter ratio of 1.2. The Company has also exceeded its permitted annual limit by almost fifteen (15) million gallons in 2003. It is possible that a modified permit may **reduce** the Company's permitted volume based upon 80 gpcd.

The Department looks forward to working with you as we begin to finalize the review of your Water Management permit and the possible preparation of a new modified permit. Please contact **Jim McLaughlin at (508)946-2805** if you have any questions regarding this letter.

Plymouth Water Company

Action: Order to Complete for 5-Year Review

**WATER MANAGEMENT PERMIT
5 YEAR REVIEW REQUEST**

Regulations governing the Water Management Program 310 CMR 36.33(4) require that all permit holders file a request for review every five years. The Department requires your signature authorizing the 5 Year Review. Please sign the document below, attach it to the additional information requested in the Department's letter, and return it to the Department by **September 13, 2004**. Upon receipt of the information the Department will begin a final review of permit # **9P4-4-24-239.05**.

Please return all information to:

DEP Southeast Region
20 Riverside Drive
Lakeville, MA 02347
Attn: Jim McLaughlin

Certification Statement

I certify, under penalty of law, that this review request and all attachments were prepared under my supervision, in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete.

Signature/Title

Date



THE COMMONWEALTH OF MASSACHUSETTS
WATER RESOURCES COMMISSION

Water Supply Agency/Company Name: PLYMOUTH WATER COMPANY INC.
Street: 133 RAYMOND ROAD City/Town: PLYMOUTH, MA Zip Code: 02360
Contact person/Title: ELLEN KITCHELL Telephone number: ()
PWS ID#: 4239045 Date completed

Please answer each of the following questions by

- circling Yes or No
- checking items that apply
- making comments in the space provided, or on attached documentation where referenced

A. General Information:

1. Residential Population served: 1951 Number of service connections: 697
2. Please give the volume and percentage of total water used by each type of customer.

	MGD or MGY	%	
a.			Agriculture
b.	<u>95,100</u>	<u>1</u>	Commercial
c.			Industrial
d.			Municipal
e.	<u>94,982,900</u>	<u>99</u>	Residential
f.			Sales to other public water suppliers
g.			Process water, including bleeders, water main flushing, filter backwash, etc. where these uses can be confidently estimated. In the case of water use that is "confidently estimated", documentation of how the estimate was arrived at will need to be provided.
h.			Institutional/tax exempt
i.			Unaccounted-for* See Section B for definition
j.			Other: please specify: _____

3. Are the percentages shown above estimates or based on actual meter readings? ACTUAL

4. What is the residential gallons per capita per day (gpcd) for your system? 194

Yes ☒ No ☐ 5. Do you maintain interconnections with other communities?

Which communities and what is your arrangement (i.e., emergency only, on request, at any time...) with that community?

Community: _____ Arrangement: _____
Community: _____ Arrangement: _____

Yes ☒ No ☐ 6. Do you have interconnections planned with other communities?

- a. With which community(ies)? _____
- b. When will interconnections be completed for each? _____
- c. What is the planned arrangement with that community(ies)? _____

Yes ☒ No ☐ 7. Do you regularly conduct a water audit* of your system to determine where water can be saved and the effectiveness of existing water conservation practices? SYSTEM DEVELOPED OVER PAST 10-12 YEARS.
How often? _____



THE COMMONWEALTH OF MASSACHUSETTS
WATER RESOURCES COMMISSION

If yes, describe in detail, the tasks and results of your most recent audit, including dates the audit began and finished.
If no, provide a schedule for implementing such an effort. Your schedule should describe who will conduct the audit, a plan for conducting the audit, and a start and end date for the audit. Use additional pages as needed.

* As defined by American Water Works Association, "A water audit identifies how much water is lost and what that loss costs the utility. Records and system-control equipment (such as meters) are thoroughly checked for accuracy. The overall system goal of the audit is to help the utility select and implement programs to reduce the distribution-system losses." For more information on conducting a water audit refer to AWWA Manual M36, "Water Audits and Leak Detection- Manual of Water Supply Practices".)

- Yes ☒ No ☐ 8. Have you distributed residential retrofit or water saving devices, or do you have a water savings device rebate program?
If yes, and residential consumption exceeds 80 gallons per capita day, describe your efforts to reduce residential consumption, including the total number and type(s) of devices retrofitted.

If no, and your residential gallons per capita day exceeds 80 gpcd, provide a plan describing the immediate implementation of such a residential retrofit or rebate program. The plan should include dates for implementation and the expected cost per year of the program. (Please note that projects requiring interbasin transfer approval will be subject to more rigorous review.)

- Yes ☒ No ☐ 9. Have water saving devices been installed in public buildings?

Describe your efforts, including location(s), and the number and type of devices replaced, and a plan and schedule for installing those devices in any buildings not currently retrofitted. If no, describe in detail a plan and schedule for installing such devices, including the dates proposed for each facility

10. Describe any other conservation efforts you are undertaking or planning to undertake: CONSUMER NOTES
ISSUED 3 TIMES PER YEAR, VOLUNTARY WATER BANS PROMOTED
IN CONCERT WITH TOWN OF PLYMOUTH IMPLEMENTATION AND
GOING FORWARD IMPLEMENTATION OF WATER AUTHORITIES APPROVED
BY DTE
11. What is approximate cost per year of your conservation efforts, including personnel costs \$ 3000.00
What is the funding source(s) for these efforts? RATES



THE COMMONWEALTH OF MASSACHUSETTS
WATER RESOURCES COMMISSION

B. Unaccounted-for Water Use:

Unaccounted-for water is the difference between water pumped or purchased and water that is metered or confidently estimated. Unaccounted-for water should include master meter inaccuracies, domestic and non-domestic meter underregistration, errors in estimating for stopped meters, overregistration revenue meters, unauthorized hydrant openings, unavoidable leakage, recoverable leakage, illegal connections, standpipe overflows, data processing errors.

Calculation of unaccounted-for water use should be based upon the volumes reported on your Annual Statistical Report filed with The Department of Environmental Protection.

1. Based on the information concerning the percentage of total water used by each type of customer described in Section A, unaccounted-for water is < 2 %.

2. Describe the "unaccounted-for" water in your system for the last three years, and how you determined it. UNACCOUNTED FOR WATER IS DIFFERENCE BETWEEN WATER PUMPED AND WATER BILLED. UNACCOUNTED FOR WATER IS CONSIDERED WITHIN INDUSTRY RANGE AND ASSUMED TO BE ATTRIBUTABLE TO METER CALIBRATION VARIANCES

3. Describe your current and ongoing efforts to lower the Town's unaccounted-for water use. N/A

4. Please estimate the percentage of raw water that is lost in treatment, that is: (raw water – finished water)/raw water). N/A

Yes No Is this lost raw water the same as, or counted as, unaccounted-for water? N/A

C. Public Education Program:

Yes No 1. Do you have a public education program for your customers?

2. Please check which items are included in your public education program:

- a. ☒ Bill stuffers. How often mailed? QUARTERLY WITH BILLINGS
b. ☐ Public service announcements (Please circle those used: cable TV radio newspapers, others: _____)
c. ☐ School materials
d. ☐ Speakers for community groups
e. ☒ Conservation information ~~center~~ MAILINGS, ISSUED THREE TIMES PER YEAR
f. ☐ Public space advertising
g. ☐ Information on lawn care, gardening, and outdoor water use
h. ☐ Demonstration gardens for xeriscaping
i. ☐ Industrial or Commercial Conservation
j. ☐ Bills which compare current use with use during the same period last year
Comments/Other: _____

3. Describe in detail your efforts to implement each of the above checked items.

How often does each item get implemented?: AS ABOVE



THE COMMONWEALTH OF MASSACHUSETTS
WATER RESOURCES COMMISSION

4. Describe what you perceive as the successes and/or failures of your public education program:

CONSUMERS NEED TO FEEL THE ECONOMIC IMPACT
OF HIGHER RATES (COST BASED UPON USE) TO ENCOURAGE
CONSERVATION PRACTICES

Yes No 5. Do you regularly contact large industrial, commercial, institutional users to encourage conservation? Describe your efforts:

N/A

D. Leak Detection and Repair:

Yes ☒ No 1. Do you have a full leak detection program for your distribution system every two years?

- a. If yes, when was the last full survey completed? _____
Attach the results or a summary of that survey which includes: who conducted the survey, miles of main surveyed, # of leaks found, estimated water loss, leaks repaired, date repaired, and the estimated water savings;
- b. When is the next full survey scheduled? _____
- c. If no survey is scheduled, how often is a 100% leak detection survey of the distribution system completed? _____

d. If no, have you ever conducted a full leak detection survey for your distribution system? When was the last survey completed? LEAK DETECTION NOT WARRANTED BASED UPON RELATIVE "NEWNESS" OF SYSTEM AND LOW "UNACCOUNTED FOR" WATER. IMPLEMENTATION OF A PROGRAM IS BEING CONSIDERED.

Yes No 2. Do you include leak detection/repair as an expense of the water system?

☒ Yes No 3a. Do you have funds set aside for regular maintenance?

☒ Yes No 3b. Do you have funds set aside for emergency repairs?

3c. Provide an estimate on how much is spent on leak detection and repairs annually or per survey? \$ _____
(per year or survey)



THE COMMONWEALTH OF MASSACHUSETTS
WATER RESOURCES COMMISSION

E. Metering:

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1. What percent of your total service accounts are metered? 100 %.
- 2a. List the number of operable meters in your system? 697
- 2b. Does your community allow the installation of a second water meter for outside water use only?
- 2c. If yes, does this above number reflect those meters?
- 2d. Are these billed at a different rate? Explain: _____
- Yes ☒ No ☐ 3. Are meters easily accessible for water system personnel to read?
4. List the percentage of users metered by category:
- | | | |
|--------------------------|--------------------|-------------------------|
| Residential <u>100</u> % | Industrial _____ % | Commercial <u>100</u> % |
| Public _____ % | Other _____ % | |
- Yes ☒ No ☐ 5. Are all public buildings metered? If not, list those not metered: N/A
- Yes ☒ No ☐ 6. Are public buildings billed for their water use? N/A
7. If you are not 100% metered for all users (including public buildings), develop a plan for installing meters in 100% of your system within 2 years. Describe your installation plan, including the number of services remaining to be metered, public buildings remaining to be metered, and an annual schedule for metering those remaining services:
- Yes ☒ No ☐ 8. Do you have a regular metering program? If yes, check which items you include:
- | | |
|--|------------------------------|
| a. _____ Repairs | d. _____ Calibration |
| b. _____ Testing | e. _____ Check for tampering |
| c. <input checked="" type="checkbox"/> Replacement | f. _____ Other |
- Yes ☒ No ☐ 9. Are your master meters calibrated annually?
- a. If yes, by whom R. E. ERICKSON, SPRING 2004
- b. Provide the most recent date each master meter has been calibrated:
- c. If no, how often? _____
10. How often are residential meters read? QUARTERLY replaced? AS REQUIRED
11. How often are large user (2" or larger) meters tested or calibrated? N/A
- Yes ☒ No ☐ 12. Do you meter water from hydrants used by contractors for pipe flushing and/or construction? WE CAN METER
- Yes ☒ No ☐ Do you bill for this use?
- Yes ☒ No ☐ 13. Do you use an automatic meter reading system? SYSTEM IN PROCESS OF CONVERSION
- a. If not, do you plan to install one?
- b. If yes, by when? IRON METER READING SYSTEM
- Yes ☒ No ☐ 14. Do you have funds set aside for regular meter repair and replacement? Provide an estimate on how much is spent annually on meter repair and replacement? \$ 1000.00



THE COMMONWEALTH OF MASSACHUSETTS
WATER RESOURCES COMMISSION

F. Pricing:

- ☒ Yes ☐ No 1. Are water supply system operations fully funded by water supply system revenues?
If yes, when did full funding become effective?
2. Which of the following items are covered by the price of water charged to customers?
- a. ☐ Watershed purchase/protection
 - b. ☐ Well site purchase/protection
 - c. ☐ Distribution system operation
 - d. ☐ Capital depreciation account
 - e. ☐ Aquifer land acquisition
 - f. ☐ Capital replacement/depreciation fund
 - g. ☐ Staff benefits package
 - h. ☐ Treatment and associated treatment plant costs
 - i. ☐ Purchase/installation of water conservation devices
 - j. ☐ All aspects of the education program
 - k. ☐ Staff training/professional development
 - l. ☐ Leak detection
 - m. ☐ Pumping
 - n. ☐ Maintenance
 - o. ☐ Hiring of staff
 - p. ☐ Leak repairs
 - q. ☐ Debt service
 - r. ☒ Electricity/fuel
 - s. ☒ All of the above
2. Please check the type of rate structure your system uses:
- a. ☒ Flat rate
 - b. ☐ Increasing block
 - c. ☐ Decreasing block
 - d. ☐ Seasonal
 - e. ☐ Other rate (please explain)

- ☒ Yes ☐ No 3. Are bills based on actual meter readings?
- Yes ☒ No 4. Do the bills compare current use with use during the previous period and the same period last year?
- Yes ☒ No 5. Is the volume of water used stated on the bill in gallons? 100 CU. FT.

6a. How often are bills sent to residential customers? Water QUARTERLY
Sewer _____

6b. How often are bills sent to large users (2" meters or larger)? Water N/A
Sewer _____

- ☒ Yes ☐ No 7. Is your rate structure regularly evaluated?
How often? IN PROCESS
When was your rate last changed?

8. Describe or attach a copy of your current pricing level(s) for water & sewer (price charged for a given volume of water and sewer)?

WATER		SEWER	
\$	per	\$	per
<u>\$25.00 QUARTERLY SERVICE CHARGE PER CUSTOMER</u>			
<u>\$1.40 PER 100 CU. FT.</u>			



THE COMMONWEALTH OF MASSACHUSETTS
WATER RESOURCES COMMISSION

G. Demand Management and Emergency Planning:

Yes ☒ No ☐ 1. Do you have a written plan describing water use reduction targets? Is this for use only during water supply emergencies, or are there year-round goals? _____ Emergencies only _____ Year-Round

SEE "DEMAND MANAGEMENT PLAN"

Yes ☒ No ☐ 2. Do you have an outside water use restriction bylaw?

Yes ☒ No ☐ Is it based on the DEP model bylaw?

Yes ☒ No ☐ 3. Do you have any other bylaws or restrictions which may control water use (for example, a municipal bylaw which restricts installation of irrigation wells or automatic sprinkler systems). Please describe:

Yes ☒ No ☐ 4. Do you have a plan describing procedures for handling water emergencies? If yes, describe the existing emergency plans:

Yes ☒ No ☐ 5. Do you have a Drought Management Plan?

If yes, describe your plan:

THE COMPANY IMPLEMENTED WATER BANS WHENEVER THE TOWN OF PLYMOUTH IMPLEMENTED SUCH BANS. IN 2003 THIS WAS UTILIZED AND CONSUMERS RESPONDED.

Yes ☒ No ☐ 6. Do you have a written procedure which outlines which users will be cut back, what emergency measures will be implemented, which trigger points require action, and how much will be cut back in the event of a water emergency or Drought? If yes, please attach.

Yes ☒ No ☐ 7. Does your system currently have the ability to implement and enforce outside water use restrictions? If yes, briefly describe your ability to implement such restrictions, including the frequency with which such restrictions have been implemented the past five years, and the thresholds used to determine when such restrictions are implemented:

8. Describe any other efforts your system has taken to evaluate and control your long-term water supply needs or demand management planning you have done:

SEE "DEMAND MANAGEMENT PLAN"

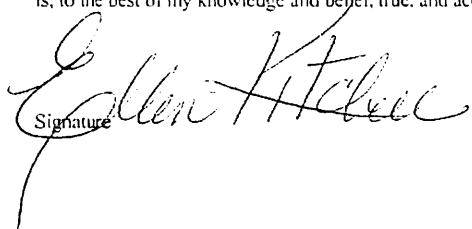

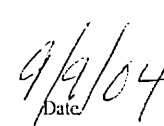


THE COMMONWEALTH OF MASSACHUSETTS
WATER RESOURCES COMMISSION

9. When was the last time you needed to implement water restrictions or water bans? VOLUNTARY BAN, SUMMER 2004
10. What actions were taken at that time? How long were these measures in place? MAILED COMMUNICATION PIECE TO ALL CUSTOMERS, TOWN OF PLYMOUTH AND DEP'S LAKEVILLE OFFICE

Certification:

I certify, under penalty of law, that the responses provided and all attachments were prepared under my supervision, in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. The information submitted is, to the best of my knowledge and belief, true, and accurate and complete.

  
Signature Title Date



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHEAST REGIONAL OFFICE
20 RIVERSIDE DRIVE, LAKEVILLE, MA 02347 508-946-2700

MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

ELLEN ROY HERZFELDER
Secretary

ROBERT W. GOLLEDGE, Jr.
Commissioner

October 1, 2004

Ms. Ellen Kitchell
Plymouth Water Company
133 Raymond Road
Plymouth, Massachusetts 02360

RE: PLYMOUTH
Plymouth Water Company
PWS ID 4239045
Program: Sanitary Survey

Dear Ms. Kitchell:

Please find attached the following information:

- Correspondence regarding the capacity review of the Plymouth Water Company.

Please note that the signature on this cover letter indicates formal issuance of the attached document.
If you have any questions regarding this letter, please contact Scott Lussier at 508-946-2732 or at
Scott.Lussier@state.ma.us.

Very truly yours,

David A. DeLorenzo
Bureau of Resource Protection

D/SL/cb

ecc: Plymouth Board of Health

File Name: Y:\DWP Archive\SERO\Plymouth-4239045-Water Quality-2004-09-30
Plymouth Water Company\Capacity Letter - Plymouth WC 2004.doc

Page 1 of 2



Recently, a sanitary survey was conducted on your system. A sanitary survey is an on-site review of the water sources, facilities, equipment, operation and maintenance of a public water system to evaluate its ability to produce and distribute safe drinking water. As part of the requirements of that inspection, you were instructed to complete the Sanitary Survey Stage II form. The Department is in receipt of this report and has reviewed its contents, along with your entire file, and has performed a capacity evaluation.

Capacity is the ability of a public water system to plan for, achieve, and maintain financial, managerial and technical compliance with applicable federal and state drinking water standards for the foreseeable future. Capacity also requires the demonstration of effective controls in all three areas.

Upon review of this system, the Department finds the Plymouth Water Company to have Adequate Capacity. The system is currently complying with state and federal regulations and is expected to do so in the future. Your system deserves commendation for the thorough submittal.

If you have any questions regarding the capacity program or you require technical assistance to in regards to financial or planning matters, please contact Scott Lussier at (508) 946-2732.

FILE

PLYMOUTH WATER COMPANY

September 10, 2004

Ms. Terry Martin
Department of Environmental Protection
Commonwealth of Massachusetts
Southeast Regional Office
20 Riverside Drive
Lakeville, Massachusetts 02347

Re: Sanitary Survey Stage II & Deficiency Response

Dear Ms. Martin:

I am enclosing the information requested in the July 13th letter of Mr. David A. Delorenzo.

Specifically, I have attached the completed Sanitary Survey with attachments and included the following independent documents: Emergency Numbers For The Plymouth Water Company; a Proposal from Alcott Associates which has been accepted and our Deficiency Response & Schedule which basically itemizes all issues and provides time frames where appropriate.

If you have any further questions, please do not hesitate to contact me.

Sincerely,


Ellen Kitchell
Controller

COPY



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHEAST REGIONAL OFFICE

20 RIVERSIDE DRIVE, LAKEVILLE, MA 02347 508-946-2700

MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

ELLEN ROY HERZFELDER
Secretary

ROBERT W. GOLLEDGE, Jr.
Commissioner

July 13, 2004

Ms. Ellen Kitchell
Plymouth Water Company
133 Raymond Road
Plymouth, Massachusetts 02360

RE: PLYMOUTH--Public Water Supply
Sanitary Survey
Plymouth Water Company
PWS ID #4239045

Dear Ms. Kitchell:

Please find attached the following information:

A sanitary survey for the above-referenced public water supply.

Please note that the signature on this cover letter indicates formal issuance of the attached document. If you have any questions regarding this letter, please contact Terry Martin at this office at (508) 946-2765.

Sincerely,

David A. DeLorenzo
Bureau of Resource Protection

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

D/TM/cb

Tmartin/pwc04.ss.doc
Y:\DWP Archive\SERO\Plymouth-4239045-Sanitary Survey-2004-07-13

ecc: Sarian Company sarianco@aol.com

Page 1 of 3

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057. TDD Service - 1-800-298-2207.

DEP on the World Wide Web: <http://www.mass.gov/dep>

Printed on Recycled Paper

SANITARY SURVEY
PLYMOUTH WATER COMPANY
PWS ID #4239045

On July 8, 2004, a Sanitary Survey of the above-referenced public water system was conducted by the Department of Environmental Protection (DEP). A sanitary survey is an on-site review of the public water system (sources, distribution system, treatment facilities, operations and maintenance, and administration) for the purpose of assessing the condition of the system and its ability to meet compliance with the regulations for providing safe drinking water.

Any deficiencies which were discovered in the course of this survey with regard to DEP standards, guidelines, and policies or violations of the Drinking Water Regulations are listed in the attached Findings and Inspection Report. The Department would expect you to take the required actions, as indicated, for any noted deficiencies. A Notice of Noncompliance (NON) may be issued under separate cover for any violations identified.

SANITARY SURVEY EVALUATION
FINDINGS AND INSPECTION REPORT

This report is intended to update the Comprehensive Compliance Evaluation (CCE) conducted for the system on June 2, 1998, and to address the current status of any recommendations included in that report. This survey included a review of the previous inspection report and an inspection of the facilities.

The following actions have been taken in response to recommendations provided in the previous reports and/or have been initiated by Plymouth Water Company:

- ✓ - During the inspection, forms related to an evaluation of the system's administration and financial capacity were provided. Capacity is defined as the ability of a public water supply to plan for, achieve and maintain financial, managerial and technical compliance with applicable federal and state drinking water standards for the foreseeable future. Completion of these forms is necessary in order for the system to be eligible for funding through the State Revolving Fund (SRF). The forms should be completed and returned to the attention of Terry Martin at the Department's Southeast Regional Office.

- A Source Water Assessment Report (SWAP) was completed for the system in September of 2003. The system was determined to have a high vulnerability to contamination via pesticide use. However, it should be noted that at the time of the CCE, information on pesticide application was obtained from ComElectric and the only pesticide use was direct application to the trunks of trees along the easement. No spraying of pesticides occurs, and no synthetic organic compounds were detected in previous sampling of the supply wells. In addition, the SWAP report references the fact that "portions of three homes" are located within the Zone I of Well #1. This information is in error, and will be amended in a revised SWAP

report. Please submit this section of your sanitary survey report with your waiver application to the Boston office.

- A Water Withdrawal Permit for the system was issued on July 18, 2000 and modified on March 8, 2002. This permit was applied for subsequent to the CCE in 1998, in which it was acknowledged that the system was approaching the 100,000 gallon per day threshold at which a permit was required. The permit contained conditions related to water conservation and demand management, due to the excessive per capita usage at the time. A five-year compliance review of the Water Withdrawal Permit is being conducted in conjunction with this survey, and the results will be issued under separate cover.
- An Administrative Consent Order was executed on March 28, 2002 for failure to submit the Demand Management Plan as required in the Water Withdrawal Permit. The plan was submitted, as required, and the Administrative Consent Order was closed. The Order called for the plan to be implemented within sixty days of approval by the Department of Telecommunications and Energy (DTE). DTE subsequently indicated that it would file the plan but would not issue a formal approval. As a result, it is not clear whether certain provisions of the plan may be implemented. Specifically, provisions related to the termination of service for water use violations within the system exist in the document but it is unclear if these may be legally enforced.
- The system has been operated by Sarian Company since May of 2003. Don Rugg, a grade 3T/4D licensed operator is the primary operator for the system, and Marisa Picone-Devine, a grade 1T/4D operator, is the secondary operator for the system,
- Since the time of the previous inspection, Well #2 has been placed on line and corrosion control equipment, consisting of a potassium hydroxide bulk storage tank, day tank and chemical metering pumps, has been installed, along with appropriate protective equipment. The pump station is alarmed, however no fencing or posting of drinking water supply signs was present. Also, an observation well gate box was bent and damaged adjacent to Station #2. This gate box should either be repaired, or removed to prevent tampering with the observation well, and the remaining observation wells should be either properly abandoned or fitted with locking caps to prevent vandalism.
- Cross connection surveys and device testing are contracted to Sarian Company.
- As of the 2003 annual statistical report, there were 697 service connections.
- An Emergency Response Plan has been prepared for the system, and an emergency phone list is kept in the vehicles of the contract operators. A copy of this list should also be posted at each of the pumping stations.

- The system has conducted routine lead and copper monitoring to evaluate corrosion control, and all recent samples are within acceptable limits. It is likely that the system will be placed on reduced monitoring for the 2005-2007 compliance period.
- There have been no water rate increases since the previous inspection, and although the quarterly billing has reduced the accounts payable amount significantly, a rate increase should be considered to reflect the full cost of system operation, as required in the Water Withdrawal Permit. Water rates should be adjusted to include the cost of routine maintenance activities which are not currently being conducted, but are considered standard water works practice. These activities would include, but not be limited to: tank inspection, cleaning and maintenance, hydrant and valve exercise and maintenance, flushing and leak detection.
- A waiver application for reduced monitoring for volatile organic compounds (VOCs), synthetic organic compounds (SOCs) and inorganic compounds (IOCs) has been sent to you from our Boston office. The Department recommends that you take advantage of this opportunity to reduce your required monitoring frequency.
- Perchlorate sampling was conducted on April 12, 2004, in accordance with the emergency regulations recently promulgated by the Department.
- A SCADA system was installed in the fall of 2003 which controls operation of the pumping stations and associated functions.
- R.V. Erickson has been contracted to perform annual maintenance including master meter calibration and pump maintenance.

Comments:

Deficiencies or Violations noted:

I

- Fencing at Station #2 should be constructed to comply with the Department's Guidelines and Policies, Section 7.1(4) which requires that the station be protected to prevent vandalism and entrance by unauthorized persons or animals. An emergency phone list shall be posted at each station, and drinking water protection signs should be posted on the fencing at Well #2 following installation.
- A water rate increase should be sought which will reflect the full cost pricing of system operation including distribution system operation and maintenance, as required in your Water Withdrawal Permit. These items include, but are not limited to: storage tank maintenance, hydrant and valve exercise and maintenance, flushing and leak detection.
- A legal opinion should be sought as to the ability to enforce the Demand

Management Plan submitted to DTE, particularly with regard to the fines and termination of service related to violation of water use restrictions.

- The observation wells in the area of Well #2 should either be properly abandoned or fitted with locking well caps to prevent vandalism.

Action Plan

II

- Within sixty (60) days, complete the Sanitary Survey Stage II – Managerial and Financial Evaluation provided during the inspection and return to Terry Martin at the letterhead address.
- Within sixty (60) days, provide a schedule to the Department to complete the items noted as deficiencies.

EMERGENCY NUMBERS FOR THE PLYMOUTH WATER COMPANY

Sarian Co.	Office	508-888-7262	Bartlett & Associates	508-668-1337
	Fax	508-888-8313	(chemical pumps)	
Don Rugg	Home:	508-420-0810		
	Pager	508-312-2026	Fall River Electric	508-675-0523
	Cell:	508-274-3807	(Rick)	
Marisa Picone-Devine	Home:	508-477-2737	Electrical Installations	
	Cell:	508-274-3484	Mike Leary – SCADA	603-520-0518
Glenn Snell	Cell	508-873-8171	RE Erickson	508-668-9330
Ellen Kitchell, Comptroller	Office	401-333-3400	JH Lynch	401-640-6899
			Carlos Fernandes cell	
Joe Landry	Home:	508-759-5497	Ann Landry	508-759-9251
	Cell:	401-640-6903	(Pulte Home)	
Plymouth Fire Dept.		508-830-4212	Eldorado Software	800-898-3838
			Bob Devine	
Plymouth Police		508-830-4220	Borden & Remington	800-543-5393
			(KOH) ACCT 36545	
Plymouth Board of Health		508-830-4090		
MEDIA			Atlantic Alarm	508-746-8411
WPLM (radio)		508-746-1390	Churchill's Oil & Gas	508-224-6536
Adelphia (tv)		508-746-5551	ACCT 112483	
Plymouth Area Access TV		508-830-6999		
Subcontractors			Envirotech Laboratory	508-888-6460
Excavation:			NSTAR	800-592-2000
Bortolotti Construction		508-771-9399	1327 913 0036	
			2720 946 0016	
HazMat Cleanup				
Enviro-Safe Corp.		508-888-5478	Verizon	508-555-1515
			508-759-6877 (office phone)	
Supplies			508-759-2959 (SCADA phone)	
Cape Cod Waterworks Supply		508-539-0990	508-759-2481 (alarm phone)	
Stiles Co.		781-769-2400		
Easton Winwater Works		508-238-1067		

The Plymouth Water Company
133 Raymond Road, Plymouth, Massachusetts 02360

Deficiency Response & Schedule

Well Site #2

- Enclosure of site is scheduled for Fall 2004
- Posting of appropriate signage will be completed following enclosure and landscaping of well site
- Observation wells located at well site have been properly capped with the exception of one well pipe which will be cut to grade and capped during the landscaping phase
- An emergency telephone contact list has been placed at both pump stations

Water Rate Increase

- The company has all ready begun preliminary work on a water rate increase
- Alcott Associates will act as counsel to the company during the rate increase request process

Legal Opinion of Certain Items Included in the Demand Management Plan

- The company has sought guidance from the Department of Telecommunications and Energy with respect to this matter
- Paul Osborne, the Assistant Director of Rates and Revenue Regulations Division, advised that DTE has approved the tariff which applies specifically to water conservation authorities and further, that he will issue a letter to that effect.

CITY: _____
PWSID: _____
PWS NAME: _____

Managerial & Financial Evaluation

MANAGEMENT

Type of system ownership (municipal, district, homeowner association, co-op, etc.)
Private

Is system for-profit or non-profit? For-profit

Indicate your governance structure (i.e. elected board, council, appointed, sole ownership, etc.)
officers

Name of person in charge (Owner, Manager, President) David C. Lynch Sr., President

Number of connections at 12/31/03 697 Population served at 12/31/03 1,951

If an organizational chart is available, please provide OR on a blank page identify the hierarchy of decision making for the PWS. Schedule attached.

System classification (i.e. VSS, 1D, 1T, etc.) 1D/1T

(Check one) Contracted operator(s) X Licensed staff _____ No Certified Operator _____

Provide staffing plan of all certified operators or complete information below.

Operator Name Donald F. Rugg Grade/Cert# D4/T3 1195/2961

Operator Name Marisa Picone-Devine Grade/Cert# D4/T1 5549/4738

Operator Name _____ Grade/Cert# _____

If you use a contract certified operator, does your system have a signed Public Water System Certified Operator Compliance Notice approved by DEP? Yes X No _____

Cross Connection Control Coordinator: Name Donald F. Rugg

Cross Connection Control Surveyor responsible for review and approval of cross connection plans:

Name Donald F. Rugg MA Cert.# 4243

CITY: _____
PWSID: _____
PWS NAME: _____

Does the governing body meet on a regular basis? Yes N/A No _____ How often? _____

Is an annual budget prepared and reviewed at governing body meetings? Yes _____ No X

Do you have or are you developing written policies or Standard Operating Procedures (SOP) for the following situations:

<i>POLICIES/ SOP</i>	<i>YES</i>	<i>NO</i>	<i>IN DEVELOPMENT</i>
Connections / Water Main Extensions	[X]	[]	[]
General Purchases	[X]	[]	[]
Metering & Unaccounted-for Water	[X]	[]	[]
Delinquent Bills	[X]	[]	[]
Employee Performance Recognition N/A	[]	[]	[]
Long-term Capital Improvement or Infrastructure Improvement	[]	[]	[X]
Operations & Maintenance	[X]	[]	[]
Customer Service	[X]	[]	[]
Wellhead Protection	[X]	[]	[]
Water use restriction by-law N/A	[]	[]	[]

Does the system have an updated master plan? X] YES [] NO

If available, please provide DEP region with a copy.

Do you have insurance? (If Yes, what is the length of the contractual agreement) Insurance certificate attached.

<i>INSURANCE</i>	<i>YES</i>	<i>NO</i>	<i>AMOUNT \$</i>
Liability	[X]	[]	\$1,000,000/\$2,000,000
Property	[X]	[]	\$60,609,138
Bonding	[]	[]	
Other: <u>Umbrella</u>	[X]	[]	\$5,000,000/\$5,000,000

Do you have a contractual or as-needed arrangement with any of the following outside services?

<i>CONTRACTUAL SERVICES</i>	<i>PLEASE CHECK</i>	<i>NAME OF CONSULTANTS</i>
Accountant	[X]	James E. Feeney CPA
Laboratory	[X]	Envirotech Laboratories Inc.
Attorney	[X]	Robert W. Curry, Edwards & Angell LLP
Technical Consultant	[]	
Other <u>System</u> Management	[X]	Sarian Company Inc.

CITY: _____
 PWSID: _____
 PWS NAME: _____

FINANCIAL INFORMATION

If you are not a rate-collecting system, please briefly describe the system's financial organization, including the billing and bookkeeping department.

SOURCE OF REVENUE (rate-collecting systems only)

Explain the water rate structure of your system? (Description should include all types of customers and all fees charged.)

	BILLING CYCLE	RATE TYPE (i.e. fixed, declining, increasing, variable)	WATER RATE (\$/100cu.ft or 1000gallons)	AVERAGE ANNUAL CUSTOMER BILL (12,000 cu.ft. or 90,000gallons)
Residential	Quarterly	Fixed	\$1.40/100 cu. ft. \$25.00 qtly service charge	136,546
Commercial				
Industrial	N/A	N/A	N/A	

Do you employ enterprise accounting? ☐ YES ☒ NO

Do you have a reserve account? ☐ YES ☒ NO If yes, how much? _____

Attach a copy of your last annual balance sheet. If you do not have a balance sheet, list "off budget" items, such as savings account, emergency fund, reserve fund, or other "rainy day" funds, judgements against the system and other assets or liabilities that would not appear on an income and expense statement. Statement Attached.

If a budget is available, please provide it. If not, please fill out the questions below.

ESTIMATED INCOME/REVENUE (rate-collecting systems only)

Please list all income and revenue for the last complete year.

A. Taxes	\$	---
B. Flat Fee (Quarterly Service Charge)	\$	65,849
C. User Fee (Water \$1.40/100 cu. ft.)	\$	177,887
D. Other _____	\$	1,676
E. TOTAL INCOME		\$245,412

CITY: _____
PWSID: _____
PWS NAME: _____

ESTIMATED OPERATION EXPENSES *(all systems)*

Please list all operating expenses for the water system for the last complete year. If you are a business or some other enterprise (i.e. nursing home, condominium association, school, etc.), list only those expenses directly related to the water system operation.

A. Personnel / Overtime Water System Management	\$ 64,351	
B. Water Quality Testing	\$ 10,593	
C. Supplies	\$ 2,463	
D. Operating Expenses - Plant	\$ 24,498	
E. Contract Services General Expense	\$ 139,472	Includes \$74,251. Depreciation
F. Repairs & Maintenance	\$ 5,057	
G. Reserve / Emergency Fund Taxes	\$ 12,550	
H. Debt Service (Principal & Interest) Asset Loss	\$ 2,708	
I. TOTAL EXPENSES		\$ 261,692

Total Income \$ 245,412 minus
Total Expenses \$ 261,692 equals \$ (16,280) Loss

How much money does the system set aside for major repairs and emergencies? -0-

What percentage of your total estimated expenses is this? -0-%

Has the system received a grant and/or low-interest loan from state and/or federal resources in the last 10 years?
[] YES [X] NO If yes, please name and state what its purpose was.

FORECASTED NEEDS IN THE NEXT 10 YEARS *(all systems)*

During the next 10 years, what projects and equipment will be needed to remain in compliance with DEP regulations?

CAPITAL IMPROVEMENT	Cost (\$)
Schedule Attached	

CAPITAL DEBT *(all systems)*

What capital debt do you have (outstanding loans, bonds, etc.)?

CAPITAL IMPROVEMENT	FUNDER	LOAN AMOUNT	ANNUAL PAYMENT	FINISH DATE
		\$ 0.00	\$ per yr.	
		\$	\$ per yr.	
		\$	\$ per yr.	
		\$	\$ per yr.	

The Plymouth Water Company
133 Raymond Road, Plymouth, Massachusetts 02360

Decision Model

Shareholders

- Acquisition and divestiture decisions
- Approval of large asset purchases
- System expansion

Corporation's President

- Asset purchases
- Approval of all significant vendor contract agreements and relationships
- Oversight of system-wide operations
- Check signing authority

Corporation's Controller

- Oversee daily water system operations, including system managers
- Oversee billings and collections
- Oversee collection and preparation of accounting information
- Financial reporting to shareholders, tax authorities, and public regulatory agencies
- Approval of "day to day" operating expenses
- Check signing authority

Contracted Water System Management Firm

- Daily operation of plant and equipment including normal maintenance of facilities, regulated testing, and general operations
- Operational reporting responsibilities to various regulatory agencies
- Customer interface including billings and collections

ACORD EVIDENCE OF PROPERTY INSURANCEDATE (MM/DD/YY)
09/09/2004

THIS IS EVIDENCE THAT INSURANCE AS IDENTIFIED BELOW HAS BEEN ISSUED, IS IN FORCE, AND CONVEYS ALL THE RIGHTS AND PRIVILEGES AFFORDED UNDER THE POLICY.

PRODUCER GOODRICH-BLESSING AGENCY, INC. ONE HARRY STREET CRANSTON, RI 02907		PHONE (A/C, Nr, Ext): 401-944-9400		COMPANY CONSTITUTION STATE INSURANCE COMPANY TRAVELERS INSURANCE COMPANY	
CODE:	SUB CODE:				
AGENCY CUSTOMER ID #:					
INSURED PLYMOUTH WATER COMPANY 133 RAYMOND ROAD PLYMOUTH, MA 02360		LOAN NUMBER	POLICY NUMBER CSP/100418/X10450/BMX711		
		EFFECTIVE DATE 02-04-04	EXPIRATION DATE 02-04-05	CONTINUED UNTIL TERMINATED IF CHECKED <input type="checkbox"/>	
THIS REPLACES PRIOR EVIDENCE DATED:					

PROPERTY INFORMATION

LOCATION/DESCRIPTION

WATER COMPANY, "THE PONDS", LUNN'S WAY, PLYMOUTH, MA

COVERAGE INFORMATION

COVERAGE/PERILS/FORMS	AMOUNT OF INSURANCE	DEDUCTIBLE
SPECIAL PUMPING EQUIPMENT	\$60,609,138	\$5,000.
EXTRA EXPENSE	\$ 25,000.	\$5,000.
GENERAL LIABILITY PER OCCURRENCE	\$1,000,000.	-----
AGGREGATE	\$2,000,000.	-----
UMBRELLA LIABILITY PER OCCURRENCE	\$5,000,000.	-----
AGGREGATE	\$5,000,000.	-----
** POLICY #BMX-711 TRAVELERS INSURANCE 12/10/03-04		

REMARKS (including Special Conditions)**CANCELLATION**

THE POLICY IS SUBJECT TO THE PREMIUMS, FORMS, AND RULES IN EFFECT FOR EACH POLICY PERIOD. SHOULD THE POLICY BE TERMINATED, THE COMPANY WILL GIVE THE ADDITIONAL INTEREST IDENTIFIED BELOW _____ DAYS WRITTEN NOTICE, AND WILL SEND NOTIFICATION OF ANY CHANGES TO THE POLICY THAT WOULD AFFECT THAT INTEREST, IN ACCORDANCE WITH THE POLICY PROVISIONS OR AS REQUIRED BY LAW.

ADDITIONAL INTEREST

NAME AND ADDRESS

J.H. LYNCH & SONS, INC.
50 LYNCH PLACE
CUMBERLAND, R.I. 02864

ATTN: ELLEN

<input type="checkbox"/> MORTGAGEE	<input type="checkbox"/> ADDITIONAL INSURED
<input type="checkbox"/> LOSS PAYEE	

LOAN #

AUTHORIZED REPRESENTATIVE



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09/08/04

Accrual Basis

PLYMOUTH WATER COMPANY, INC.

Balance Sheet

As of December 31, 2003

	Dec 31, 03
ASSETS	
Current Assets	
Checking/Savings	
2040 · Cash	268,985.47
Total Checking/Savings	268,985.47
Other Current Assets	
1000 · PLANT INVESTMENT	
1010 · Organization	
1012 · Cost-organization	200.00
1011 · Accumulated Amortization	-200.00
Total 1010 · Organization	0.00
1030 · Land	147,000.00
1040 · Structures - Well #1	
1042 · Cost-Structures	1,104,474.05
1041 · Accum Deprec-Structures	-458,443.00
Total 1040 · Structures - Well #1	646,031.05
1045 · Structures - Well #2	
1047 · Cost-Structures	731,231.49
1046 · Accum Deprec-Structures	-26,665.00
Total 1045 · Structures - Well #2	704,566.49
1050 · Pumping Plant Equipment-Plant 1	
1052 · Cost-Pumping Plant Equip	82,985.37
1051 · Accum Deprec- Pumping Plant Equ	-82,970.00
Total 1050 · Pumping Plant Equipment-Pla...	15.37
1060 · Misc. Pump Plant Equip-Plant 1	
1062 · Cost-Misc Pump Plant Equip	64,723.83
1061 · Accum Deprec-Misc Pump Plnt Equ	-13,531.00
Total 1060 · Misc. Pump Plant Equip-Plant 1	51,192.83
1080 · Transmission & Distribution	
1082 · Cost-Trans & Dist	1,118,515.00
1081 · Accum Deprec-	-26,653.00
Total 1080 · Transmission & Distribution	1,091,862.00
1100 · Consumer Meters & Measuring	
1102 · Cost-Cons Meter & Measure	95,084.83
1101 · Accum Deprec-Cons Meter & Meas	-40,198.00
Total 1100 · Consumer Meters & Measuring	54,886.83
1136 · Miscellaneous Expenditures	
1138 · Cost-Misc Expenditures	933.23
1137 · Accum Deprec-Misc Expenditures	-419.00
Total 1136 · Miscellaneous Expenditures	514.23
Total 1000 · PLANT INVESTMENT	2,696,068.80

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Accrual Basis

PLYMOUTH WATER COMPANY, INC.
Balance Sheet
As of December 31, 2003

	<u>Dec 31, 03</u>
1139 · GENERAL EQUIPMENT	
1140 · Office Equipment	
1142 · Cost-Office Equipment	9,287.51
1141 · Accum Depr-Office equip	<u>-5,751.00</u>
Total 1140 · Office Equipment	<u>3,536.51</u>
Total 1139 · GENERAL EQUIPMENT	3,536.51
2039 · CURRENT ASSETS	
2070 · Accounts receivable	<u>46,252.44</u>
Total 2039 · CURRENT ASSETS	<u>46,252.44</u>
Total Other Current Assets	<u>2,745,857.75</u>
Total Current Assets	3,014,843.22
Other Assets	
2129 · PREPAID ACCOUNTS	
2130 · Prepaid Insurance	1,055.00
2138 · Prepaid Income Tax	1,231.00
2145 · Deferred Income Tax	<u>40,613.00</u>
Total 2129 · PREPAID ACCOUNTS	<u>42,899.00</u>
Total Other Assets	<u>42,899.00</u>
TOTAL ASSETS	<u><u>3,057,742.22</u></u>
LIABILITIES & EQUITY	
Liabilities	
Current Liabilities	
Other Current Liabilities	
3069 · CURRENT LIABILITIES	
3080 · Accounts Payable	<u>88,034.64</u>
Total 3069 · CURRENT LIABILITIES	88,034.64
3129 · ACCRUED LIABILITIES	
3130 · Tax Liability	<u>23,614.00</u>
Total 3129 · ACCRUED LIABILITIES	23,614.00
3209 · APPROPRIATED SURPLUS	
3230 · Contributions in Aid -of Constr	<u>2,150,515.00</u>
Total 3209 · APPROPRIATED SURPLUS	<u>2,150,515.00</u>
Total Other Current Liabilities	<u>2,262,163.64</u>
Total Current Liabilities	2,262,163.64

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Accrual Basis

PLYMOUTH WATER COMPANY, INC.
Balance Sheet
As of December 31, 2003

	Dec 31, 03
Long Term Liabilities	
3139 · Long Term Liability	
3125 · Note Payable Treasury Stock	200,000.00
Total 3139 · Long Term Liability	200,000.00
Total Long Term Liabilities	200,000.00
Total Liabilities	2,462,163.64
Equity	
3050 · Treasury Stock	-392,000.00
3009 · CAPITAL STOCK	
3020 · Preferred Stock	2,000.00
Total 3009 · CAPITAL STOCK	2,000.00
3040 · PREMIUM ON CAPITAL STOCK	1,200,000.00
4000 · PROFIT & LOSS	-74,818.13
4009 · CREDITS	
4010 · Credit Bal. Begin Fiscal Period	-117,368.56
4020 · Credit Bal From Income Acct	-5,954.70
Total 4009 · CREDITS	-123,323.26
Net Income	-16,280.03
Total Equity	595,578.58
TOTAL LIABILITIES & EQUITY	3,057,742.22

The Plymouth Water Company
133 Raymond Road, Plymouth, Massachusetts 02360

Anticipated Capital Improvements

Well Site #1

▪ Well Cleaning	15,000
▪ KOH Pump Upgrades	3,000
▪ Roadway Construction	15,000
▪ Fence Upgrades and Landscaping	15,000
▪ Repair/replace System Pumps	60,000
▪ Replace VFD units	45,000
▪ Clean and Restore 2,000,000 gallon Storage Tank	35,000

Well Site #2

▪ Purchase Back-up Generator	30,000
▪ Well Cleaning (10 years out)	20,000
▪ Enclose Site and Landscape	47,000

Distribution System

▪ Establish and Implement Annual Distribution Maintenance Plan	5,000
▪ Design and Implement Leak Detection Program As Needed	2,500
▪ Conversion of Older Services to Radio Read Frequency System (New services are installed with RRF)	TBD